

**ITEM NO. 23**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	X	
	:	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
	X	

**STIPULATION FOR ENTRY OF JOINT FINAL PRE-TRIAL ORDER**

Pursuant to Local Rule 7016-1, (a) movant City of Detroit (“City”) and (b) objectors (i) Shirley V. Lightsey, President of the Detroit Retired City Employees Association (the “DRCEA”), (ii) Don Taylor, President of the Retired Detroit Police and Firefighters Association (the “RDPFFA”), (iii) the DRCEA, (iv) the RDPFFA, (v) the Official Committee of Retirees (the “Committee”), (vi) the Michigan Council 25 of the American Federation of State, County and Municipal Employees (“AFSCME”), (vii) the UAW, (viii) the General Retirement System of the City of Detroit, (ix) the Police and Fire Retirement System of the City of Detroit, (x) the Detroit Public Safety Unions; and (xi) the Retired Detroit Police Members Association (collectively, “Objectors” to the City’s July 18, 2013



Eligibility Motion), have conferred and hereby stipulate to entry of the Final Joint Pre-Trial Order attached hereto as Exhibit 1.

Dated: October 17, 2013

Respectfully submitted,

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Detroit*

# EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
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Debtor. : Hon. Steven W. Rhodes  
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**JOINT FINAL PRE-TRIAL ORDER**

Pursuant to Local Rule 7016-1, (a) movant City of Detroit (“City”) and (b) objectors (i) Shirley V. Lightsey, President of the Detroit Retired City Employees Association (the “DRCEA”), (ii) Don Taylor, President of the Retired Detroit Police and Firefighters Association (the “RDPFFA”), (iii) the DRCEA, (iv) the RDPFFA, (v) the Official Committee of Retirees (the “Committee”), (vi) the Michigan Council 25 of the American Federation of State, County and Municipal Employees (“AFSCME”), (vii) the UAW, (viii) the General Retirement System of the City of Detroit, (ix) the Police and Fire Retirement System of the City of Detroit, (x) the Detroit Public Safety Unions; and (xi) the Retired Detroit Police Members Association to the City’s July 18, 2013 Motion (“Eligibility Motion”),

have conferred and hereby submit the following Joint Final Pretrial Order for this Court's approval and adoption.

## **I. JURISDICTION**

### **A. City of Detroit**

The City asserts that this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue for this matter is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

### **B. Objectors**

The Objectors assert that this Court lacks the authority and jurisdiction to decide whether chapter 9 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the "Bankruptcy Code") violates the Constitution or to determine the constitutionality of PA 436, the Local Financial Stability and Choice Act, M.C.L. §141.1541, *et seq.* ("PA 436"). Accordingly, and with respect, this Court should immediately refer this constitutional challenge to chapter 9 and PA 436 to the District Court for the Eastern District of Michigan.

## **II. STATEMENT OF CITY'S CLAIMS**

The City of Detroit asserts that it qualifies to be a debtor under Section 109(c) of Title 11 of the Bankruptcy Code and meets all of the eligibility requirements to seek debt relief under Chapter 9.

The City is a municipality as such term is defined in Section 101(40) of the Bankruptcy Code. 11 U.S.C. § 101(40). The City is a “political subdivision” of the State of Michigan and thus a “municipality” within the meaning of Section 101(40), and the eligibility requirement of section 109(c)(1) of the Bankruptcy Code is satisfied.

The City is specifically authorized in its capacity as a municipality to be a debtor under Chapter 9 under the laws of the State of Michigan and by the appropriate state officers empowered thereby, as contemplated by Section 109(c)(2) of the Bankruptcy Code. On July 16, 2013 Kevyn D. Orr, the duly appointed Emergency Manager for the City (the “Emergency Manager”), based on his assessment of the City’s financial condition recommended to Richard Snyder, Governor of the State of Michigan, and Andrew Dillon, Treasurer of the State of Michigan, that the City be authorized to proceed under Chapter 9. On July 18, 2013, the Governor issued his written decision approving the Emergency Manager’s recommendation to seek protection under the bankruptcy laws. Pursuant thereto, also on July 18, 2013, the Emergency Manager issued an order approving the filing of the City’s Chapter 9 case consistent with the Governor’s authorization.

The City is insolvent within the meaning of Section 101(32)(C) of the Bankruptcy Code. The City therefore meets the eligibility requirement of Section 109(c)(3) of the Bankruptcy Code.

The City desires to effect a plan of adjustment under Section 109(c)(4) of the Bankruptcy Code.

The City is unable to negotiate (or further negotiate) with its creditors because such negotiation is impracticable. The City has nevertheless negotiated in good faith with creditors who are represented and organized, but has failed to obtain the agreement of creditors holding at least a majority in amount of the claims of each class that the City intends to impair under a plan of adjustment in this Chapter 9 case.

### **III. STATEMENT OF OBJECTORS' CLAIMS**

#### **A. The Committee asserts the following claims:**

1. The City cannot meet the criteria for eligibility under Section 109(c)(5)(B) of the Bankruptcy Code, in that it did not put forth a plan of adjustment, and did not negotiate in good faith, both as required under that Section.
2. The City cannot establish that negotiations were impracticable under Section 109(c)(5)(C) of the Bankruptcy Code, in that the City failed to set forth a plan of adjustment, and did not negotiate in good faith with classes of



creditors with whom negotiations were practicable, both as required under that Section.

3. Because the Governor's authorization to file this bankruptcy case did not prohibit the City from impairing the pension rights of its employees and retirees, the authorization was not valid under the Michigan Constitution, as required for eligibility by 11 U.S.C. §109(c)(2).

4. The City cannot meet its burden under Section 921(c) of demonstrating that it filed its Chapter 9 petition in good faith, in that (a) the Emergency Manager commenced this proceeding for the purpose of using Chapter 9 as a vehicle to attempt to impair and violate rights relating to vested pensions that are explicitly protected under Article IX, Section 24, of the Michigan Constitution (the "Pension Clause") and (b) in connection with its petition, the City made representations that were inaccurate, misleading and/or incomplete.

**B. The Detroit Public Safety Unions, consisting of the Detroit Fire Fighters Association (the "DFFA"), the Detroit Police Officers Association (the "DPOA"), the Detroit Police Lieutenants & Sergeants Association (the "DPLSA") and the Detroit Police Command Officers Association (the "DPCOA") assert the following claims:**

1. The City failed to negotiate with the Detroit Public Safety Unions in good faith, as required by 11 U.S.C. §109(c)(5)(B).

2. Michigan Public Act 436 of 2012 violates the Michigan Constitution and therefore the City was not validly authorized to file this bankruptcy case as required for eligibility by 11 U.S.C. §109(c)(2).

3. Because the Governor's authorization to file this bankruptcy case did not prohibit the City from impairing the pension rights of its employees and retirees, the authorization was not valid under the Michigan Constitution, as required for eligibility by 11 U.S.C. §109(c)(2).

4. Chapter 9 of the Bankruptcy Code violates the 10th Amendment of the United States Constitution, U.S. Const., Am. X, to the extent it can be read to authorize the City to impair the vested pension rights of City employees in violation of the Michigan Constitution.

5. The city was not "unable to negotiate with creditors because such negotiation is impracticable," as required (in the alternative) for eligibility by 11 U.S.C. §109(c)(5)(C).

6. The City's bankruptcy petition should be dismissed because it was filed in bad faith under 11 U.S.C. §921(c).

**C. The Retiree Association Parties, consisting of the Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”), and Shirley V. Lightsey, individually and as President of the DRCEA assert the following claims:**

1. The City failed to negotiate with the Retiree Association Parties in good faith, as required by 11 U.S.C. § 109(c)(5)(B).

2. The City was not “unable to negotiate with creditors because such negotiation is impracticable,” as required (in the alternative) for eligibility by 11 U.S.C. § 109(c)(5)(C).

3. Negotiations with the retiree constituents was practicable, as the DRCEA and the RDPFFA were ready, willing, and able to negotiate with the City as natural representatives of retirees.

4. Because the Governor’s authorization to file this bankruptcy case did not prohibit the City from impairing the pension rights of its employees and retirees, the authorization was not valid under the Michigan Constitution, as required for eligibility by 11 U.S.C. §109(c)(2).

5. The City’s bankruptcy petition should be dismissed because it was filed in bad faith under 11 U.S.C. §921(c).

**D. UAW and the *Flowers* Plaintiffs assert the following claims:**

The UAW and the Plaintiffs claim that the City of Detroit is not eligible for bankruptcy under Chapter 9 of the Bankruptcy Code for the reasons set forth in the

Amended Joint Objection of International Union, UAW and the Flowers Plaintiffs to the City of Detroit, Michigan's Eligibility for an Order for Relief Under Chapter 9 of the Bankruptcy Code [DE 1170], the Objection of International Union, UAW to the City of Detroit, Michigan's Eligibility for an Order for Relief Under Chapter 9 of the Bankruptcy Code [DE 506] (to the extent such Objection is not superseded by DE 1170), the Objection of Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman to the Putative Debtor's Eligibility to be a Debtor [DE 504], and the Pre-Trial Brief of International Union, UAW and the Flowers Plaintiffs with Respect to the Eligibility of the City of Detroit, Michigan for an Order for Relief Under Chapter 9 of the Bankruptcy Code [filed October 17, 2013].

**E. The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees ("AFSCME") assert, in addition to and including herein by reference, the claims raised in this order, in filed pleadings, oral argument and adduced through evidence at trial, assert the following claims:**

1. Chapter 9 violates the United States Constitution and AFSCME's active and retired members have individual standing to assert that chapter 9 violates the Constitution.
2. The City is not eligible to file for chapter 9 protection under 11 U.S.C. § 109(c) because (i) it is not authorized by Michigan State Law or the Michigan Constitution to be a Debtor under chapter 9, and (ii) the law purporting

to authorize the City to file chapter 9 - PA 436 - is unconstitutional including, without limitation, because it violates the strong home rule provisions of the Michigan Constitution.

3. The City is not eligible to file for chapter 9 protection under 11 U.S.C. § 109(c) of the Bankruptcy Code because (i) it failed to participate in any good faith negotiations with creditors such as AFSCME prior to the filing for bankruptcy, and (ii) such negotiations were not impracticable, as required for eligibility under chapter 9 of the Bankruptcy Code.

4. The City's Petition should be dismissed under 11 U.S.C. § 921(c) because it was filed in bad faith.

5. The City has failed to meet its burden of proving its insolvency as require under 11 U.S.C. § 109(c)(3).

**F. The Retired Detroit Police Members Association (RDPMA) assert, in addition to and including herein by reference, the claims raised in this order by the other objectors, the claims set forth in pleadings, raised in oral argument and adduced through evidence presented at trial, assert the following claims:**

1. The City of Detroit is not eligible for relief under Chapter 9 pursuant to Section 109(c) of the Bankruptcy Code because it is not authorized under Michigan State Law and the Constitution of the State of Michigan to be a debtor under Chapter 9.

2. Public Act 436 was passed in derogation of the right of referendum set forth in Article II Section 9 of the Michigan Constitution and is therefore unconstitutional under Michigan Law.

3. Emergency Manager Kevyn Orr was not authorized by Public Act 436 to file the instant Chapter 9 proceeding on behalf of the City of Detroit.

4. RDPMA's Exhibit A is a true and correct copy of the March 2, 2012 1:35:25 PM Email from Jeffrey B. Ellman to Corinne Ball and copying Heather Lennox and Thomas Wilson.

5. RDPMA's Exhibit B is a true and correct copy of the March 3, 2012 4:00:44 PM Email from Heather Lennox to Andy Dillon and copying Corinne Ball, Hugh Sawyer, Jeffrey Ellman, Ken Buckfire, Kyle Herman, Laura Marcero, Sanjay Marken, BromStibitz, Stuart Erickson, David Kates and Thomas Wilson.

6. RDPMA's Exhibit C is a true and correct copy of the State of Michigan, Comprehensive Annual Financial Report, for the Fiscal Year Ended September 30, 2012.

7. RDPMA's Exhibit D is a true and correct copy of the January 31, 2013 3:45:47 PM Email from Kevyn Orr to Corinne Ball and copying Stephen Brogan.

**G. The Police and Fire Retirement System of the City of Detroit ("PRFS") and the General Retirement System of the City of**

**Detroit (“GRS” and together with PFRS, the “Retirement Systems”) assert the following claims.**

1. The City is not specifically authorized to be a debtor under chapter 9 by State law or a by a governmental officer empowered by State law to authorize such entity to be a debtor under such chapter and cannot satisfy 11 U.S.C. § 109(c)(2).
2. The City cannot meet its burden of proof under 11 U.S.C. § 109(c)(5)(B) because it did not engage in good faith negotiations with its creditors.
3. The City cannot meet its burden of proof under 11 U.S.C. § 109(c)(5)(C) because it did not negotiate with its creditors and negotiations were not impracticable.
4. The City’s bankruptcy petition should be dismissed because the City did not file the petition in good faith as required by 11 U.S.C. § 921(c).

**IV. STIPULATED FACTS**

1. The City of Detroit is a municipality for purposes of Section 109(c)(1) of the Bankruptcy Code.
2. On March 15, 2013 the Local Emergency Financial Assistance Loan Board created by the Emergency Municipal Loan Act, MCL §§ 141.931-141.942, appointed Kevyn D. Orr to the position of “emergency financial manager” for the City of Detroit.

3. Mr. Orr formally took office as Emergency Manager on March 25, 2013.

4. A meeting took place in Detroit on June 14, 2013 between the Emergency Manager and the City's advisors, on the one hand, and numerous creditor representatives, on the other, relating to the City's creditor proposal. Representatives of all Objectors except the Retiree Committee, which had not yet formed, attended the meeting.

5. City's Exhibit 42 is a true and correct copy of a list of persons and corporate affiliations who responded that they would attend the June 14, 2013 creditor meeting in Detroit and is admissible as proof of such responses, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

6. A meeting took place in Detroit on the morning of June 20, 2013 between the City's advisors, on the one hand, and non-uniformed employee representatives from the City's unions and four retiree associations, on the other, relating to retiree health and pension obligations. Representatives and advisors the General Retirement System ("GRS") also attended the meeting.

7. A second, separate meeting took place in Detroit in the afternoon of June 20, 2013 between the City's advisors, on the one hand, and uniformed employee representatives from the City's unions and four retiree associations, on



the other, relating to retiree health and pension obligations. Representatives and advisors from the PFRS also attended the meeting.

8. City's Exhibit 45 is a true and correct copy of a list of persons and corporate affiliations who were invited to attend at least one of the two June 20, 2013 creditor meeting in Detroit and is admissible as proof of such invitations, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

9. City's Exhibit 46 is a true and correct copy of the sign-in sheet for the morning June 20, 2013 creditor meeting in Detroit and is admissible as proof of such attendance, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

10. City's Exhibit 47 is a true and correct copy of the sign-in sheet for the afternoon June 20, 2013 creditor meeting in Detroit and is admissible as proof of such attendance, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

11. A meeting took place on June 25, 2013 between the City's advisors, on the one hand, and representatives and advisors from the City's six bond insurers and U.S. Bank, the trustee or paying agent on all of the City's bond issuances. Representatives from Objectors GRS and PFRS also attended the meeting.



17. A second, separate meeting took place in the afternoon of July 10, 2013 between the City's advisors, on the one hand, and uniformed employee representatives from the City's unions and four retiree associations, on the other, relating to pension funding and related matters. Representatives and/or advisors from Objectors DFFA, DPLSA, DPCOA, DPOA, RDPFFA, and PFRS attended the meeting.

18. City's Exhibit 57 is a true and correct copy of the sign-in sheet for the second July 10, 2013 creditor meeting in Detroit and is admissible as proof of such attendance, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

19. A meeting took place on the morning of July 11, 2013 between the City's advisors, on the one hand, and non-uniformed employee representatives from the City's unions and four retiree associations, on the other, relating to retiree health issues and related matters. Representatives and/or advisors from Objectors UAW, DRCEA, AFSCME, and GRS attended the meeting.

20. City's Exhibit 58 is a true and correct copy of the sign-in sheet for the morning July 11, 2013 creditor meeting in Detroit and is admissible as proof of such attendance, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

21. A second, separate meeting took place in the afternoon of July 11, 2013 between the City's advisors, on the one hand, and uniformed employee representatives from the City's unions and four retiree associations, on the other, relating to retiree health issues and related matters. Representatives and/or advisors from Objectors DFFA, DPLSA, DPOA, RDPFFA, and PFRS attended the meeting.

22. City's Exhibit 59 is a true and correct copy of the sign-in sheet for the afternoon July 11, 2013 creditor meeting in Detroit and is admissible as proof of such attendance, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

23. City's Exhibit 55 is a true and correct copy of a list of persons and corporate affiliations who were invited to attend one or more of the July 10 and 11, 2013 creditor meetings in Detroit and is admissible as proof of such invitations, without prejudice to any individual Objectors' right to offer evidence as to its actual attendance.

24. City's Exhibit 35 is a true and correct copy of a non-exclusive log of creditor meetings or communications between the City and various creditors or creditor representatives and is admissible as evidence that such meetings or communications took place between the individuals or entities reflected thereon. This stipulation is without prejudice to the City's right to offer evidence that

additional persons attended such meetings or that additional meetings took place, and is without prejudice to any individual Objectors' right to offer evidence as to its actual participation or attendance.

25. On July 16, 2013, the Emergency Manager sent a letter to the Governor, recommending a Chapter 9 proceeding pursuant to Section 18(1) of PA 436.

26. On July 18, 2013, the Governor sent a reply letter to the Emergency Manager authorizing the City to file its voluntary petition for protection under Chapter 9 of title 11 of the United States Code.

27. The City filed its voluntary petition for protection under Chapter 9 on July 18, 2013.

28. On August 2, 2013, the City held a meeting with local union representatives respecting active employee health insurance.

29. On September 13, 2013 the City filed the City of Detroit, Michigan's Objections and Responses to Detroit Retirement Systems' First Requests for Admission Directed to the City of Detroit Michigan [Docket No. 849], in which the City "[a]dmit[s] that the City intends to seek to diminish or impair the Accrued Financial Benefits of the participants in the Retirement Systems through this Chapter 9 Case."

30. The representatives of the DFFA, DPOA, DPLSA and DPCOA, respectively, have authority to negotiate wages and benefits for the active employee members of the respective Detroit Public Safety Unions.

31. Each of the respective Detroit Public Safety Unions represents the active employees of each of the DFFA, DPOA, DPLSA and DPCOA.

## **V. ISSUES OF FACT AND LAW TO BE LITIGATED**

### **A. City's Position**

The City identifies the following issues of fact and law to be litigated:

1. Whether the City was generally not paying its debts as they become due.
  - a. City's authority
    - (1) 11 U.S.C. § 109(c)(3).
    - (2) 11 U.S.C. § 101(32)(C)(i).
    - (3) *In re New York City Off-Track Betting Corp.*, 427 B.R. 256, 272 (Bankr. S.D.N.Y. 2010) (finding deferral of current payments evidence of debtor's insolvency).
2. Whether the City was unable to pay its debts as they become due.
  - a. City's authority
    - (1) 11 U.S.C. § 109(c)(3).
    - (2) 11 U.S.C. § 101(32)(C)(ii).

- (3) *In re City of Stockton*, 493 B.R. 772, 788-90 (Bankr. E.D. Cal. 2013) (test for cash insolvency is prospective; demonstration of cash insolvency within current or succeeding fiscal year satisfies cash flow test; concepts of “budget insolvency” and “service delivery insolvency” inform inquiry into “cash insolvency”).
- (4) *In re City of Bridgeport*, 129 B.R. 332, 336-38 (Bankr. D. Conn. 1991) (test for municipal insolvency set forth at 11 U.S.C. § 101(32)(C)(ii) is a “cash flow” test; “[T]o be found insolvent a city must prove that it will be unable to pay its debts as they become due in its current fiscal year or, based on an adopted budget, in its next fiscal year.”).
- (5) *Int’l Ass’n of Firefighters, Local 1186 v. City of Vallejo (In re City of Vallejo)*, 408 B.R. 280, 293-94 (B.A.P. 9th Cir. 2009) (a municipality need not pursue all possible means of generating and conserving cash prior to seeking chapter 9 relief; affirming finding of insolvency where raiding city’s other funds to satisfy short term cash needs “would leave Vallejo more debilitated tomorrow than it is today”; finding city insolvent where further funding reductions would threaten its ability to provide for the basic health and safety of its citizens).
- (6) *New York City Off-Track Betting Corp.*, 427 B.R. at 282 (“Even assuming [the debtor] could have theoretically done more to avoid bankruptcy, courts do not require chapter 9 debtors to exhaust every possible option before filing for chapter 9 protection.”).

3. Whether the City desires to effect a plan to adjust its debts.

a. City’s authority

- (1) 11 U.S.C. § 109(c)(4).
- (2) *New York City Off-Track Betting Corp.*, 427 B.R. at 272 (“no bright-line test for determining whether a debtor desires to effect a plan” exists because of the “highly subjective nature of the inquiry”).
- (3) *City of Vallejo*, 408 B.R. at 294-95 (A putative debtor need only show that the “purpose of the filing of the chapter 9 petition [is] not simply ... to buy time or evade creditors”; a municipality may meet the subjective eligibility requirement of section 109(c)(4) by attempting to resolve claims, submitting a draft plan or producing other direct or circumstantial evidence customarily submitted to show intent).
- (4) *City of Stockton*, 493 B.R. at 791-92 (fact that a city would be left in worse financial condition as a result of the decision not to attempt to adjust its debts through the chapter 9 process is persuasive evidence of the municipality’s honest desire to effect such an adjustment of debt).

4. Whether the City was unable to negotiate with its creditors prior to the filing of its chapter 9 petition because such negotiation was impracticable.

a. City’s authority

- (1) 11 U.S.C. § 109(c)(5)(C).
- (2) *New York City Off-Track Betting Corp.*, 427 B.R. at 276-77 (“Congress added [11 U.S.C. § 109(c)(5)(C)] to satisfy section 109’s negotiation requirement in response to possible large municipality bankruptcy cases that could involve vast numbers of creditors.”; “[I]mpracticability of



negotiations is a fact-sensitive inquiry that depends upon the circumstances of the case.”) (quotation omitted).

- (3) *In re Cnty. of Orange*, 183 B.R. 594, 607 n.3 (Bankr. C.D. Cal. 1995) (“Section 109(c)(5)(C) was necessary because it was otherwise impossible for a large municipality, such as New York, to identify all creditors, form the proper committees, and obtain the necessary consent in a short period of time.”).
- (4) *City of Vallejo*, 408 B.R. at 298 (“Petitioners may demonstrate impracticability by the sheer number of their creditors ....”; finding that section 109(c)(5)(C) is satisfied where negotiation with any significant creditor constituency is impracticable).
- (5) *City of Stockton*, 493 B.R. at 794 (finding that the inability of a municipal debtor to negotiate with a natural representative of a numerous and far-flung creditor class (with the power to bind such class) may satisfy the “impracticability” requirement; refusal of creditors to negotiate establishes independent grounds for a finding of impracticability).
- (6) *In re Valley Health Sys.*, 383 B.R. 156, 163 (Bankr. C.D. Cal. 2008) (“Negotiations may also be impracticable when a municipality must act to preserve its assets and a delay in filing to negotiate with creditors risks a significant loss of those assets.”).

5. Whether the City negotiated in good faith with creditors holding at least a majority in amount of the claims of each class that the City intends to impair pursuant to a plan of adjustment.

a. City's authority

- (1) 11 U.S.C. § 109(c)(5)(B).
- (2) *In re Vills. at Castle Rock Metro. Dist. No. 4*, 145 B.R. 76, 84-85 (Bankr. D. Colo. 1990) (a municipality need not negotiate with every creditor within a given class; negotiations with large or prominent blocs of creditors will suffice to render a city eligible for chapter 9 relief; municipality satisfied requirement of negotiating with creditors by consulting with large institutional bondholders, even though all series of bonds were not invited to participate in negotiations).
- (3) *New York City Off-Track Betting Corp.*, 427 B.R. at 274-75 (finding that debtor had satisfied section 109(c)(5)(B) of the Bankruptcy Code where it had “engaged in negotiations with creditors regarding the possible terms of a reorganization plan prior to filing”; stating that “talks need not involve a formal plan to satisfy section 109(c)(5)(B)’s negotiation requirement.”).
- (4) *City of Vallejo*, 408 B.R. at 297 (noting that section 109(c)(5)(B) is satisfied where the debtor conducts “negotiations with creditors revolving around a proposed plan, at least in concept.... [that] designates classes of creditors and their treatment....”).

6. Whether the City's petition was filed in good faith within the meaning of section 921(c) of the Bankruptcy Code.

a. City's authority

- (1) 11 U.S.C. § 921(c).
- (2) *City of Stockton*, 493 B.R. at 794 (good faith “is assessed on a case-by-case basis in light of all the facts, which must be balanced against the broad

remedial purpose of chapter 9”; “[r]elevant considerations in the comprehensive analysis for § 921 good faith include whether the City’s financial problems are of a nature contemplated by chapter 9, whether the reasons for filing are consistent with chapter 9, the extent of the City’s prepetition efforts to address the issues, the extent that alternatives to chapter 9 were considered, and whether the City’s residents would be prejudiced by denying chapter 9 relief.”).

- (3) *Cnty. of Orange*, 183 B.R. at 608 (Bankr. C.D. Cal. 1995) (“[T]he purpose of the filing must be to achieve objectives within the legitimate scope of the bankruptcy laws;” applying chapter 11 case law and finding the debtor’s financial condition and motives, local financial realities and whether the debtor was seeking to “unreasonably deter and harass its creditors or attempting to effect a speedy, efficient reorganization on a feasible basis” as relevant factors in the good faith analysis).
- (4) *In re McCurtain Municipal Auth.*, No. 07-80363, 2007 WL 4287604, at \*5 (Bankr. E.D. Okla. Dec. 4, 2007) (holding that the existence of a factor precipitating a chapter 9 filing does not require a finding that the debtor’s filing was made in bad faith when other reasons for filing bankruptcy are present).

## **B. Objectors’ position**

### **B-1. The Committee identifies the following issues of fact and law to be litigated:**

1. Whether the City can meet the criteria for eligibility under Section 109(c)(5)(B) of the Bankruptcy Code and, in particular:

- a. whether the City presented a plan of adjustment to the City's creditors as is required under Section 109(c)(5)(B); and
- b. whether the City negotiated in good faith as is required under Section 109(c)(5)(B).

2. Whether the City can establish that good faith negotiations were impracticable under Section 109(c)(5)(C) of the Bankruptcy Code and, in particular:

- a. whether the City presented a plan of adjustment to the City's creditors as is required under Section 109(c)(5)(C); and
- b. whether the City negotiated in good faith with classes of creditors with whom negotiations were practicable, as is as required under Section 109(c)(5)(C).

3. Whether the Governor's authorization to file this bankruptcy case is void and/or unconstitutional under the Michigan Constitution because he did not prohibit the City from impairing the pension rights of its employees and retirees, as required for eligibility by 11 U.S.C. §109(c)(2).

4. Whether the City can meet its burden under 11. U.S.C. § 921(c) of demonstrating that it filed its Chapter 9 petition in good faith and, in particular:

- a. whether the City's Emergency Manager filed this Chapter 9 proceeding for the purpose of attempting to use Chapter 9 as a vehicle to impair and violate rights related to vested pensions that are expressly protected from such impairment and violation under the Pension Clause of the Michigan Constitution; and

- b. whether the City, in connection with filing its Chapter 9 petition, made representations that were false, misleading and or incomplete statements, particularly as regards the magnitude of the City's unfunded pension liability, the cash flow available to meet such liability and the availability of substantial additional cash from assets owned by the City that are capable of being monetized.

**B-2. The Detroit Public Safety Unions, consisting of the Detroit Fire Fighters Association (the "DFFA"), the Detroit Police Officers Association (the "DPOA"), the Detroit Police Lieutenants & Sergeants Association (the "DPLSA") and the Detroit Police Command Officers Association (the "DPCOA") assert the following claims:**

1. Whether the City failed to negotiate with the Detroit Public Safety Unions in good faith, as required by 11 U.S.C. §109(c)(5)(B).
2. Whether Michigan Public Act 436 of 2012 violates the Michigan Constitution, Art. IX, Sec. 24, and therefore the City was not validly authorized to file this bankruptcy case as required for eligibility by 11 U.S.C. §109(c)(2).
3. Whether there was valid authorization for the filing of the chapter 9 petition as required by 11 U.S.C. §109(c)(2), because the Governor's authorization did not prohibit the impairment of the pension rights of the City's employees and retirees, and therefore was not valid under the Michigan Constitution, Art. IX, Sec. 24 (the "Pension Clause").

4. Whether chapter 9 of the Bankruptcy Code violates the Tenth Amendment, U.S. Const., Am. X, to the extent it allows the City to use the Bankruptcy Code to impair the vested pension rights of City employees and retirees in direct violation of the Pension Clause.

5. Whether the city was not "unable to negotiate with creditors because such negotiation is impracticable," as required (in the alternative) for eligibility by 11 U.S.C. §109(c)(5)(C).

6. Whether the City's bankruptcy petition should be dismissed because it was filed in bad faith under 11 U.S.C. §921(c).

**B-3. The Retiree Association Parties, consisting of the Retired Detroit Police & Fire Fighters Association ("RDPFFA"), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association ("DRCEA"), and Shirley V. Lightsey, individually and as President of the DRCEA identify the following issues of fact and law to be litigated:**

1. Whether the City failed to negotiate with the Retiree Association Parties in good faith, as required by 11 U.S.C. § 109(c)(5)(B).

2. Whether City was not "unable to negotiate with creditors because such negotiation is impracticable," as required (in the alternative) for eligibility by 11 U.S.C. § 109(c)(5)(C).

3. Whether negotiations with the retiree constituents was practicable, as the DRCEA and the RDPFFA were ready, willing, and able to negotiate with the City as natural representatives of retirees.

4. Whether the Governor's authorization to file this bankruptcy case is void and/or unconstitutional under the Michigan Constitution because he did not prohibit the City from impairing the pension rights of its employees and retirees, as required for eligibility by 11 U.S.C. §109(c)(2).

5. Whether the City's bankruptcy petition should be dismissed because it was filed in bad faith under 11 U.S.C. §921(c).

**B-4. The UAW and the Flowers Plaintiffs identify the following factual and legal issues to be litigated:<sup>1</sup>**

1. Whether the City has met the eligibility requirement of Section 109(c)(4) of the Bankruptcy Code that a municipality “desires to effect a plan to adjust such debts” where the City’s proposed plan is a plan that cannot be lawfully implemented under state law as required by Section 943(b)(4) and (6) of the Bankruptcy Code.

2. Whether the City failed to negotiate with the UAW in good faith, as required by 11 U.S.C. §109(c)(5)(B).

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<sup>1</sup> The issues set forth herein are the UAW’s and the Flowers Plaintiffs’ principal legal and factual issues to be presented at, or in connection with, the eligibility trial. UAW reserves all of the issues set forth in its Amended Objection which (a) are not listed herein but which may depend upon the resolution of its principal issues set forth above or (b) have been asserted and argued principally by other parties, such as whether the decision in Webster must be applied by the bankruptcy court.

3. Whether the City was unable to negotiate with creditors because such negotiation was impracticable as required (in the alternative) for eligibility by 11 U.S.C. §109(c)(5)(C).

4. Whether the City was authorized to be a debtor under Chapter 9 as required by 11 U.S.C. Section 109(c)(2), as follows: whether the Governor's authorization was valid under State law, where (a) the City and the Governor manifested an intent to proceed in Chapter 9 in order to reduce the accrued pension rights of the City's employees and retirees, and the accrued pension rights of employees and retirees of the Detroit Public Library; (b) the City and the Governor did so proceed based on such intent of the City and the Governor, which in whole or in part motivated the Governor's authorization for the City's Chapter 9 filing and the City's filing itself; (c) the Governor's authorization did not prohibit the diminishment or impairment of the pension rights of such persons as a condition of authorizing the Chapter 9 filing; (d) neither the Governor nor the state Legislature were had authority to act in derogation of Article 9, Section 24 of the Michigan Constitution; and (e) for any and all of the foregoing reasons, the Governor's authorization for the Chapter 9 filing, and the City's filing itself were and are contrary to the Michigan Constitution, Art. 9, Sec. 24.

5. Whether the City's bankruptcy petition was filed in bad faith under 11 U.S.C. §921(c).



6. Whether, under the U.S. Constitution, Chapter 9 is constitutional as applied to the City's petition where the City does not comply with Article 9, Section 24 of the Michigan Constitution.

**B-5. The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees ("AFSCME") assert, in addition to and including herein by reference, the claims raised in this order, in filed pleadings, oral argument and adduced through evidence at trial, identifies the following issues of fact and law to be litigated:**

1. Whether the City failed to negotiate in good faith with creditors as required by 11 U.S.C. § 109(c)(5), including, without limitation:

- a. Whether the City engaged only in "discussions," which it emphasized were not negotiations.
- b. Whether the City's June 14, 2013 Restructuring Plan was not open to negotiations, which falls short of the requirements of section 109(c)(5)(B).
- c. Whether the City refused AFSCME's offers to negotiate.
- d. Whether the City refused AFSCME's requests for adequate backup data used to generate the City's financial assumptions, which would have been necessary information for any "negotiations."
- e. Whether the City's refusal to negotiate with AFSCME continued post-filing.
- f. Whether assuming, *arguendo*, that any negotiations took place, such negotiations did not relate to a plan that was

in the best interests of creditors as required by section 109(c)(5)(B).

2. Whether the City can meet its burden of proving that it was "unable to negotiate with creditors because such negotiation is impracticable," as required for eligibility by 11 U.S.C. § 109(c)(5)(C), and including, without limitation:

- a. Whether the circumstances surrounding the City's hiring of the EM, an experienced bankruptcy counsel demonstrate that the City never had any intention of negotiating outside of bankruptcy.
- b. Whether negotiations with the City's main creditors, the unions, its retirees, and the bond trustees, were practicable.
- c. Whether the City cannot demonstrate impracticability where the City failed to negotiate with its largest creditors, especially where those creditors have, like AFSCME, sought negotiations.

3. Whether the City's bankruptcy petition should be dismissed because it was filed in bad faith under 11 U.S.C. § 921(c), including, without limitation:

- a. Whether the State authorized (without contingencies) and the City commenced its filing to avoid a bad state court ruling in the Webster litigation, and declined to take action to cease the filing in violation of the Declaratory Judgment issued in that litigation.

- b. Whether the City never intended to negotiate (in good faith or otherwise) and failed to consider reasonable alternatives to chapter 9.

4. Whether the City is "insolvent," as defined in 11 U.S.C. § 101(32)(C)) and as required for eligibility by 11 U.S.C. § 109(c)(3), including, without limitation:

- a. Whether the City has failed to prove its insolvency by expert evidence, by expert testimony, or by anything other than unproven assumptions (including assumptions regarding the unfunded amount of the City's pension and other retiree benefits).
- b. Whether the City failed to explore options to enable it to pay debts, such as taking into account un-monetized assets and possible funding sources not included in the City's financial projections.
- c. Whether the City's current financial difficulties are less severe than in prior years, and the City already had means to enhance revenues prior to the filing including the deal reached with the swap counterparties.

5. Whether the Governor's authorization to the EM to file for chapter 9 under Section 11 of PA 436 was improper, including, without limitation, because it was invalid, unconstitutional, failed to contain contingencies (such as not using the bankruptcy proceedings to diminish vested pension benefits), and/or failed to require that any plan of adjustment not violate Article IX Section 24 of the Michigan Constitution.

- a. Whether the EM's exercise of authority under PA 436 violated the strong home rule provisions of the Michigan Constitution.

**B-6. The Retired Detroit Police Members Association ("RDPMA")**  
assert, in addition to and including herein by reference, the claims raised in this order by the other objectors, the claims set forth in pleadings, raised in oral argument and adduced through evidence presented at trial, identifies the following issues of fact and law to be litigated:

1. Whether Public Act 436 violates the Michigan Constitution, Article II, Section 9.
  - a. Whether the spending provisions found in Sections 34 and 35 of Public Act 436 were included as an artifice to avoid the referendum provisions in Art. II, Sec. 9 of the Michigan Constitution.
  - b. Whether any provisions of Public Act 436 should be stricken on the grounds that such provisions were not approved by a majority of the electors of the State of Michigan in a general election.
2. Whether the City of Detroit acted in bad faith when it filed its Chapter 9 Petition having knowledge that Public Act 436 was passed in derogation of the Michigan Constitutional referendum requirement.
3. Whether Emergency Manager Kevyn Orr was properly appointed under Public Act 436.

**B-7. The Retirement Systems identify the following issues of fact and law to be litigated:**

1. Whether the City was validly authorized under State law by a governmental officer empowered by State law to authorize it to be a debtor when

the Governor's authorization was in violation of Article IX, section 24 of the Michigan Constitution, because the authorization did not prohibit the City from diminishing or impairing accrued financial benefits.

2. Whether the City failed to negotiate in good faith prepetition with the Retirement Systems (and possibly other creditors), when all meetings with the Retirement Systems (and possibly other creditors) were presentations to an audience of multiple parties at which no bilateral negotiations occurred.

3. Whether the City can meet its burden of proof under 11 U.S.C. § 109(c)(5)(B).

4. Whether negotiations with the Retirement Systems and the City's other creditors were impracticable.

5. Whether the City can meet its burden of proof under 11 U.S.C. § 109(c)(5)(C).

6. Whether the City can meet its burden of proof under 11 U.S.C. § 921(c) and demonstrate that it filed the bankruptcy petition in good faith when:

- a. The City filed the case with the intention to diminish and impair accrued financial benefits in violation of Article IX, section 24 of the Michigan Constitution;
- b. The Emergency Manager repeatedly threatened to file a bankruptcy immediately in the weeks before the filing, thus otherwise creating an environment of impracticability;

- c. As of the petition date, the Emergency Manager and the City did not have a clear picture of the City's assets, income, cash flow, and liabilities;
- d. The City did not even consider a restructuring scenario that did not impair accrued financial benefits; and
- e. Whether the City can demonstrate that it negotiated in good faith under section 109(c)(5) and the case law construing it where the City has admitted it does not have (and therefore did not negotiate) a formulated plan of adjustment.

## **VI. EVIDENTIARY PROBLEMS LIKELY TO ARISE AT TRIAL**

### **A. City's Position**

The City believes that evidentiary disputed likely to arise at trial can be addressed at the pre-trial conference.

### **B. Objectors' Position**

Objectors concur.

## **VII. WITNESSES**

### **A. City's Witnesses**

The City will call the following individuals as part of its case in chief or on rebuttal:

- 1. Kevyn D. Orr
- 2. Kenneth A. Buckfire
- 3. Gaurav Malhotra
- 4. Charles M. Moore
- 5. James E. Craig

The City may call the following individuals as part of its case in chief or on rebuttal:

1. Glenn Bowen
2. Kyle Herman, Director at Miller Buckfire (only as needed to sponsor City exhibits 99-101)
3. Custodial Witnesses. The City Objectors have been conferring as to the authenticity and admissibility of certain exhibits which would otherwise require the appearance in court of a custodial witness. The City reserves the right to call such witnesses if appropriate stipulations are not reached.

The City will call the following witnesses to testify, by deposition, as follows:

1. Richard Baird, October 10, 2013  
58:10-12  
58:16-19  
59:25-60:14  
100:13-101:6
4. Treasurer Andrew Dillon, October 10, 2013  
34:6-35:10  
63:17-20  
64:2-5  
65:4-24  
65:14-6:6  
66:19-68:18  
68:23-69:22  
74:13-77:6  
98:13-99:3
5. Governor Richard D. Snyder, October 9, 2013

19:17-21:7  
32:14-33:14  
46:7-9  
46:20-23  
51:17-53:16  
53:24-55:8  
56:9-25  
57:23-58:3  
65:21-66:1  
67:9-14  
77:15-78:13  
81:21-82:18  
82:25-83:8  
86:5-25  
89:1-8  
92:23-93:5  
104:14-16  
104:22-105:16  
104:25-106:17  
110:7-12  
115:3-8  
115:20-116:12  
117:3-13  
118:3-7  
118:12-119:24  
122:21-123:22  
129:14-130:5  
131:10-133:9  
134:18-22  
142:19-143:4  
143:13-18

The City counter designates the following testimony in response to all of  
Objectors' deposition designations:

1. Lamont Satchel, September 19, 2013

11:11-14:13  
46:12-47:21



47:12-48:21  
48:23-49:6  
49:22-50:6  
54:11-55:20  
58:17-59:15  
60:18-61:21  
61:2-63:5  
62:16-25  
65:7-66:9  
68:1-74:24  
70:5-71:4  
71:17-72:2  
79:2-81:16  
82:9-84:22  
86:12-87:2  
88:13-19  
88:14-89:18  
89:25-90:1  
90:4-91:12

2. Glen Bowan, September 24, 2013

12:7-9  
18:9-20  
19:12-20  
19:21-21:15  
22:14-23:5  
23:12-21  
24:17-22  
28:10-29:1  
29:2-30:14  
33:15-34:7  
34:8-21  
35:12-36:4  
36:10-12  
40:3-41:12  
44:11-13  
43:15-44:8  
60:13-61:10  
63:21-64:5

66:15-67:22  
68:17-71:3  
81:20-83:10  
91:18-92:13  
93:4-14  
93:15-94:2  
98:13-99:3  
99:9-17  
100:18-22  
111:20-112:22  
129:14-22  
130:8-132:11  
133:10-134:18  
141:9-17  
142:8-10  
142:13-19  
143:1-6  
143:8-19  
146:8-19  
147:2-148:15  
148:19-22  
149:2-3  
149:6-8  
150:5-15  
174:11-176:21  
177:3-11  
177:18-178:3  
177:4-16  
183:17-185:11  
192:8-193:11  
194:4-12  
194:13-195:10  
198:5-7  
198:17-19  
203:20-204:9  
204:11-14  
204:16-19  
205:7-206:11

3. David Bing, October 14, 2013

10:5-10:21  
14:22-16:16  
18:10-19:4  
20:25-21:4  
36:10-37:12  
58:12-58:16  
64:24-65:5  
75:12-75:21  
101:14-103:11  
108:10-108:25  
109:6-109:8

The City has not counterdesignated deposition testimony in response to any Objectors' designations from witnesses on the City's will-call witness list because the City will call those witnesses to testify in person at trial. The City nevertheless reserves its rights to offer appropriate counterdesignations in the event that any witness on its will-call list becomes unavailable to testify under Federal Rule of Evidence 804(a).

The City reserves its rights to offer appropriate counterdesignations in response to deposition designations offered by any Objector without reasonable notice to the City prior to the submission of this Joint Final Pre-trial Order.

Given the short time frame within which the City was required to assert objections to Objectors' documents, the City reserves its rights to provide supplemental objections should it need to do so. Similarly, should the same document appear more than once in Objectors' collective exhibit lists, an objection

by the City to any one instance of the exhibit applies to all such copies, even if no objection was indicated for the other copies.

The City reserves its rights to object to deposition testimony offered by any Objector, other than form of the question.

The City reserves its rights to call any witness identified by any Objector.

## **B. Objectors' Witnesses**

Objectors' witnesses are indicated in Attachments A-G.

# **VIII. EXHIBITS**

## **A. City's Exhibits**

1. Charter – City of Detroit
2. Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2008
3. Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2009
4. Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2010
5. Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2011
6. Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2012
7. November 13, 2012, Memorandum of Understanding City of Detroit reform Program
8. July 18, 2013 Declaration of Gaurav Malhotra in Support of the Debtor's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code (the "Malhotra Declaration")
9. Cash Flow Forecasts

10. Ten-Year Projections
11. Legacy Expenditures (Assuming No Restructuring)
12. Schedule of the sewage disposal system bonds and related state revolving loans as of June 30, 2012
13. Schedule of water system bonds and related state revolving loans as of June 30, 2012
14. Annual Debt Service on Revenue Bonds
15. Schedule of COPs and Swap Contracts as of June 30, 2012
16. Annual Debt Service on COPs and Swap Contracts
17. Schedule of UTGO Bonds as of June 30, 2012
18. Schedule of LTGO Bonds as of June 30, 2012
19. Annual Debt Service on General Obligation Debt & Other Liabilities
20. July 18, 2013 Declaration of Kevyn D. Orr In Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code (the "Orr Declaration")
21. January 13, 2012, City of Detroit, Michigan Notice of Preliminary Financial Review Findings and Appointment of a Financial Review Team
22. March 26, 2012, Report of the Detroit Financial Review Team
23. April 9, 2012, Financial Stability Agreement
24. December 14, 2012, Preliminary Review of the City of Detroit
25. February 19, 2013, Report of the Detroit Financial Review Team
26. March 1, 2013, letter from Governor Richard Snyder to the City
27. July 8, 2013, Ambac Comments on Detroit

28. July 16, 2013, Recommendation Pursuant to Section 18(1) of PA 436
29. July 18, 2013, Authorization to Commence Chapter 9 Bankruptcy Proceeding
30. July 18, 2013, Emergency Manager Order No. 13 Filing of a Petition Under Chapter 9 of Title 11 of the United States Code
31. Declaration of Charles M. Moore in Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code (the "Moore Declaration")
32. Collection of correspondence between Jones Day and representatives of Unions regarding the representation of current retirees
33. Chart on verbal communications with Unions regarding the representation of current retirees authored by Samantha Woo
34. Memorandum to File about communications with Unions regarding the representation of current retirees authored by Samantha Woo dated October 4, 2013
35. Redacted log of meetings and correspondence between the City and its advisors and various creditors prior to July 18, 2013
36. FRE 1006 chart summarizing meetings and communications with union creditors
37. FRE 1006 chart summarizing meetings and communications with union creditors
38. FRE 1006 chart summarizing monthly cash forecast absent restructuring
39. February 21, 2013 to June 21, 2013 Calendar of Lamont Satchel
40. List of Special Conferences for Association held with Members of Police Labor Relations

41. June 10, 2013, City of Detroit Financial and Operating Plan Slides
42. RSVP List of June 14, 2013 Proposal for Creditors Meeting
43. June 14, 2013, City of Detroit Proposal for Creditors
44. June 14, 2013, Proposal for Creditors – Executive Summary
45. List of Invitees to the June 20, 2013 Meetings
46. Sign-in sheets from June 20, 2013, 10:00 AM-12:00 PM (Non-Uniform Retiree Benefits Restructuring)
47. Sign-in sheets from June 20, 2013 2:00-4:00 PM (Uniform Retiree Benefits Restructuring)
48. June 20, 2013 City of Detroit Retiree Legacy Cost Restructing – Non-Uniform Retirees
49. June 20, 2013 City of Detroit Retiree Legacy Cost Restructuring – Uniform Retirees
50. Invitee List and Sign-in Sheet for the June 25, 2013 Meeting
51. Cash Flow Forecasts provided at June 25, 2013 Meeting
52. Composite of emails attaching 63 letters dated June 27, 2013 to participants of the June 20, 2013 meetings
53. List of Attendees at July 9 and 10, 2013 Creditor Meetings
54. Detroit Future City Plan 2012
55. Collection of correspondence regarding invitations to the July 10 Pension Meetings and July 11 Retiree Health Meetings
56. July 10, 2013 City of Detroit Sign In Sheet for 1:00 PM Pension and Retiree Meeting
57. July 10, 2012 City of Detroit Sign In Sheet for 3:00 PM Police and Fire Meeting

58. July 11, 2013 City of Detroit Sign-in Sheet for 10:00 AM Non-Uniformed Meeting
59. July 11, 2013 City of Detroit Sign-in Sheet for the 1:30 PM Uniformed Meeting
60. July 11, 2013 City of Detroit Union – Retiree Meeting Draft Medicare Advantage Plan Design Options
61. Correspondence between representatives of AFSCME and representatives of the City
62. Michigan Attorney General Opinion No. 7272
63. July 31, 2013 Notice of Filing Amended List of Creditors Holding 20 Largest Unsecured Claims
64. September 30, 2013 Notice of Filing of Second Amended List of Creditors and Claims, Pursuant to Section 924 and 925 of The Bankruptcy Code
65. June 4, 2013 Letter from Glenn Bowen and Katherine A. Warren to Evan Miller
66. June 4, 2013 Letter from Glenn Bowen and Katherine A. Warren to Evan Miller
67. June 14, 2013 Letter from Glenn Bowen and Katherine A. Warren to Evan Miller
68. June 30, 2011, Gabriel Roeder Smith & Company, 73<sup>rd</sup> Annual Actuarial Valuation of the General Retirement System of the City of Detroit
69. April 2013, Gabriel Roeder Smith & Company, Draft 74<sup>th</sup> Annual Actuarial Valuation of the General Retirement System of the City of Detroit as of June 30, 2012
70. June 30, 2012, Gabriel Roeder Smith & Co., 71<sup>st</sup> Annual Actuarial Valuation of the Police and Fire Retirement System of the City of Detroit



71. November 8, 2012 Letter from Kenneth G. Alberts to The Retirement Board Police and Fire Retirement System for the City of Detroit
72. November 21, 2011 Memorandum from Irvin Corley, Jr., to Council Members of the City of Detroit City Council
73. July 17, 2013 Letter from Evan Miller to representatives of the City of Detroit Police and Firefighters Unions
74. July 15, 2013 Quarterly Report with Respect to the Financial Condition of the City of Detroit (period April 1<sup>st</sup> – June 30<sup>th</sup>)
75. May 12, 2013 City of Detroit, Office of the Emergency Manager, Financial and Operating Plan
76. Responses of International Union, UAW to Debtor's First Set of Interrogatories
77. UAW Privilege Log
78. Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO, and Sub-Chapter 98, City of Detroit Retirees Responses and Objections to Debtor's First Set of Interrogatories
79. The Detroit Retirement Systems' Responses and Objections to the Debtor's First Interrogatories
80. Amended (Signed) Response of Detroit Police Command Officers Association to Debtor's First Set of Interrogatories to the Detroit Public Safety Unions
81. Response of Detroit Police Lieutenants & Sergeants Association to Debtor's First Set of Interrogatories to the Detroit Public Safety Unions
82. Response of Detroit Police Officers Association to Debtor's First Set of Interrogatories to the Detroit Public Safety Unions
83. Answers to Debtor's First Interrogatories to Retiree Association Parties

84. Retired Detroit Police Members Association's Answers to Debtor's First Set of Interrogatories
85. Responses of the Official Committee of Retirees to Debtor's First Set of Interrogatories
86. Objection and Responses of International Union, UAW to Debtor's First Request for Production of Documents
87. Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO, and Sub-Chapter 98, City of Detroit Retirees Responses and Objections to Debtor's First Set of Requests for Production of Documents
88. The Detroit Retirement Systems' Responses and Objections to the Debtor's First Set of Request for Production of Documents
89. Amended (Signed) Response of Detroit Police Command Officers Association to Debtor's First Requests for Production of Documents to the Detroit Public Safety Unions
90. The Detroit Fire Fighters Associations' (DFFA) Response to Debtor's First Request for Production of Documents
91. Response of Retiree Association Parties to Debtor's First Requests for Production of Documents
92. Retired Detroit Police Members Association Response to Debtor's First Requests for Production
93. June 14, 2013 Index Card #1 from Nicholson
94. June 14, 2013 Index Card #2 from Nicholson
95. June 20, 2013 Typewritten Notes from June 20, 2013 Presentation
96. July 16, 2013 Nicholson Affidavit in *Flowers*
97. August 19, 2013 UAW Eligibility Objection
98. Nicholson Letter To Irwin re UAW Discovery Responses



So ORDERED this \_\_\_\_ day of October \_\_\_\_, 2013.

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Steven W. Rhodes  
United States Bankruptcy Judge

# ATTACHMENT A

## **THE RETIRED DETROIT POLICE MEMBERS ASSOCIATION'S WITNESS LIST, EXHIBIT LIST AND DEPOSITION DESIGNATIONS**

**THE RETIRED DETROIT POLICE MEMBERS ASSOCIATION'S  
WITNESS LIST, EXHIBIT LIST AND DEPOSITION DESIGNATIONS**

The Retired Detroit Police Members Association ("RDPMA"), through its counsel, Strobl & Sharp, P.C., hereby submits the following Consolidated (1) Witness List, (2) Exhibit List and (3) Deposition Designations:

***I. Witness List***

A. The RDPMA hereby submit this consolidated witness list of individuals who will be called as witnesses in the eligibility trial:

1. Howard Ryan
2. Treasurer Andrew Dillon
3. Governor Richard Snyder
4. Emergency Manager Kevyn Orr, September 16, 2013

B. The RDPMA hereby reserves the right to call as a witness any witness identified by any other party, regardless of whether such witness is called to testify.

C. The RDPMA hereby reserves the right to call as a witness any rebuttal and/or impeachment and/or foundation witness as necessary..

***II. Exhibit List***

The RDPMA hereby submits this consolidated exhibit list of evidence that will or may be used as evidence during the eligibility trial:

<b><u>RDPMA Exhibit No.</u></b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
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1.	03/02/13 - Dillon Dep. Ex. 6 - CTMI00234878, (email correspondence)	Hearsay ; Relevance
2.	03/03/12 - Dillon Dep. Ex. 7 - DTMI00234877 -880, (email correspondence)	Hearsay ; Relevance
3.	09/30/12 - Comprehensive Annual Financial Report	Relevance
4.	Orr Deposition Exhibit 4, September 16, 2013 Email correspondence dated January 31, 2013 Bates No. JR-RD-0000295-296	

### ***III. Deposition Designations***

**The RDPMA hereby submits the following deposition designations:**

10/14/13 Howard Ryan

p. 29, L.4 - 15

p. 30, L. 13 - 25

p. 43, L. 14 - p. 47, L. 5

10/09/13 Richard Snyder

p. 27, L. 8 - p. 29, L. 12

10/10/13 Andrew Dillon

p. 34, L. 3 - 5

p. 35, L. 11 - p. 36, L. 22

09/16/13 Kevyn Orr

p. 43 L18 – p. 46, L. 6

## **ATTACHMENT B**

### **THE RETIREE ASSOCIATION PARTIES' CONSOLIDATED (1) WITNESS LIST AND (2) EXHIBIT LIST**



**THE RETIREE ASSOCIATION PARTIES' CONSOLIDATED  
(1) WITNESS LIST AND (2) EXHIBIT LIST**

The Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”), and Shirley V. Lightsey, individually and as President of the DRCEA (collectively “Retiree Association Parties”) through their counsel, Lippitt O’Keefe, PLLC and Silverman & Morris, P.L.L.C., submit the following Consolidated (1) Witness List, (2) Exhibit List and (3) Deposition Designations:

***I. Witness List***

A. The Retiree Association Parties hereby submit this consolidated witness list of individuals who will be called as witnesses in the eligibility trial:

1. Shirley V. Lightsey (see Declaration, Dkt. 502)  
c/o Lippitt O’Keefe, PLLC  
370 E. Maple Road  
Third Floor  
Birmingham MI, 48009  
(248) 646-8292

Ms. Lightsey is prepared to testify on matters including, but not limited to, the fact that the City did not negotiate on retiree matters (pension and OPEB), her attendance at multiple presentational meetings, that the DRCEA is a natural representative of the City of Detroit general retirees, that the DRCEA was ready, willing and able to negotiate with the City on Retiree issues, that the DRCEA unsuccessfully requested to meet with Kevyn Orr and on the qualifications, history, successes and structure of the DRCEA.

2. Donald Taylor (see Declaration, Dkt. 502)  
c/o Lippitt O'Keefe, PLLC  
370 E. Maple Road  
Third Floor  
Birmingham MI, 48009  
(248) 646-8292

Mr. Taylor is prepared to testify on matters including, but not limited to, the fact that the City did not negotiate on retiree matters (pension and OPEB), his attendance at multiple presentational meetings, that the RDPFFA is a natural representative of the City of Detroit uniformed (police and fire) retirees, that the RDPFFA was ready, willing and able to negotiate with the City on Retiree issues, that the RDPFFA met with Kevyn Orr during which he stated that pensions would not be diminished or impaired and that certain classes of retirees covered by a consent judgment would not have their medical benefits impaired, the unsuccessful requests for follow up meetings with Mr. Orr or City officials and on the qualifications, history, successes and structure of the DRCEA.

3. Any and all witnesses listed, regardless of whether they are called, on the witness list of any party.

4. Any and all witnesses necessary to provide a proper foundation for any physical and/or documentary evidence or to rebut the same regarding testimony or other evidence sought to be admitted by any party

## ***II. Exhibit List***

The Retiree Association Parties hereby submit this consolidated exhibit list of evidence that will or may be used as evidence during the eligibility trial:

<b>Retiree Association Parties' Exhibit No.</b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
1.	Declaration of Shirley V. Lightsey (Dkt. 497, Ex. 2)	Hearsay ; Relevance
2.	Declaration of Donald Taylor (Dkt. 497, Ex. 3)	Hearsay ; Relevance

3.	Bylaws of DRCEA (RetAssnParties000032-000036)	
4.	Bylaws of RDPFFA (RetAssnParties000043-000060)	
5.	Articles of Incorporation for DRCEA (RetAssnParties000038-000041)	
6.	Articles of Incorporation for RDPFFA (RetAssnParties000042)	
7.	Notice and Consent forms from DRCEA Members (See CD, Bates No. RetAssnParties000061)	
8.	Notice and Consent forms from RDPFFA Members (See CD, Bates No. RetAssnParties000062)	
9.	Letter from Shirley V. Lightsey to Kevyn Orr, dated May 4, 2013 (RetAssnParties000181)	
10.	Letters from DRCEA members to the DRCEA (RetAssnParties000001- 000021)	Hearsay ; Relevance
11.	Letters from RDPFFA members to the RDPFFA;	Hearsay ; Relevance
12.	Materials provided by the City at the April 18, 2013 presentation;	Copies of Exhibits not provided
13.	Materials provided by the City at the June 14, 2013 presentation (Orr Dep. Ex. 9, Dkt. 438-16, City of Detroit Proposal for Creditors)	Copies of Exhibits not provided
14.	Materials provided by the City at the June 20, 2013 presentation:	Copies of Exhibits not provided
15.	Materials provided by the City at the July 10, 2013 presentation;	Copies of Exhibits not provided
16.	Materials provided by the City at the July 11, 2013 presentation;	Copies of Exhibits not provided

17.	Wieler consent judgment (RetAssnParties000143-000180)	Hearsay ; Relevance
18.	U.S. Trustee Retiree Committee Questionnaires completed by the following:  a. Shirley V. Lightsey (RetAssnParties000100-000104) b. Donald Taylor (RetAssnParties000121-000125)	Hearsay ; Relevance
19.	Any and all documents, correspondence and/or other materials authored by any witnesses identified in Plaintiff's witness list that contain relevant facts and/or information regarding this matter	Non-specific; non-compliant with Local Rule 7016-1(a)(9)
20.	Any and all exhibits identified by any party	
21.	Any and all exhibits included in filings of the Retiree Association Parties.	Non-specific; non-compliant with Local Rule 7016-1(a)(9)

## ATTACHMENT C

### **THE OFFICIAL COMMITTEE OF RETIREES' CONSOLIDATED (1) WITNESS LIST, (2) EXHIBIT LIST AND (3) DEPOSITION DESIGNATIONS**

**THE OFFICIAL COMMITTEE OF RETIREES’  
CONSOLIDATED (1) WITNESS LIST,  
(2) EXHIBIT LIST AND (3) DEPOSITION DESIGNATIONS**

The Official Committee of Retirees (the “Committee”), through their counsel, Dentons US LLP, for the Eligibility Hearing scheduled to start October 23, 2013, submit the following Consolidated (1) Witness List, (2) Exhibit List and (3) Deposition Designations:

***I. Witness List***

A. The Committee hereby submits this consolidated witness list of individuals who will be called as witnesses via deposition testimony in the eligibility trial:

1. Emergency Manager Kevyn D. Orr
2. Conway MacKenzie Senior Managing Director Charles Moore
3. Michigan Treasurer Andy Dillon

B. The Committee hereby submits this consolidated witness list of individuals who may be called as witnesses via deposition testimony in the eligibility trial:

1. Milliman Principal and Consulting Actuary Glenn Bowen
2. Michigan Labor Relations Director Lamont Satchel
3. Ernst & Young LLP Principal Guarav Malhotra
4. Kenneth Buckfire

5. Governor Richard D. Snyder

6. Howard Ryan

D. The Committee hereby reserves the right to call as witnesses any witness called by any other party.

## ***II. Exhibit List***

The Committee hereby submits this consolidated exhibit list of evidence that will or may be used as evidence during the eligibility trial:

<b><u>Committee's Exhibit No.</u></b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
1.	01/30/13 - Orr Dep. Ex. 1, JD-RD-0000113 (email chain)	
2.	01/31/13 - Orr Dep Ex. 2, JD-RD-0000303 (email chain)	
3.	01/31/13 - Orr Dep. Ex. 3, JD-RD-0000300-02 (email chain)	
4.	01/31/13 - Orr Dep. Ex. 4, JD-RD-0000295-96 (email chain)	
5.	Orr Dep. Ex. 5, M.C.L.A. Const. Art. 9, § 24	
6.	02/20/13 - Orr Dep Ex. 6, JD-RD-0000216-18 (email chain)	
7.	02/22/13 - Orr Dep. Ex. 7, JD-RD-0000459-64 (email chain)	
8.	05/12/13 - Orr Dep. Ex. 8, (Financial and Operating Plan)	
9.	06/14/13 - Orr Dep. Ex. 9, Dkt. 438-16 (City of Detroit Proposal for Creditors)	
10.	07/16/13 - Orr Dep. Ex. 10, Dkt. 11-10 (letter Re: Recommendation Pursuant to Section 18(I) of PA 436)	
11.	07/18/13 - Orr Dep. Ex. 11, Dkt. 11-11	

	(letter Re: Authorization to Commence Chapter 9 Bankruptcy Proceeding)	
12.	07/12/13 - Orr Dep. Ex. 12, Dkt. 512-6 (letter Re: City of Detroit Pension Restructuring)	
13.	07/17/13 - Orr Dep. Ex. 13, Dkt. 512-6 (letter Re: City of Detroit Pension Restructuring)	
14.	09/11/13 - Orr Dep. Ex. 14, (Retiree Legacy Cost Restructuring Presentation)	
15.	07/18/13 - Orr Dep. Ex. 15, Dkt. 11 (Declaration of Kevyn Orr)	
16.	09/13/13 - Orr Dep. Ex. 17, Dkt. 849 ( City of Detroit Objections and Responses to Detroit Retirement Systems' Frist Requests for Admission Directed to the City of Detroit	
17.	06/27/13 - Orr Dep. Ex. 18, DTMI00082699 (letter Re: City of Detroit Restructuring)	
18.	02/13/13 - Orr Dep. Ex. 20, JD-RD-0000334-36 (email chain)	
19.	01/29/13 - Orr Dep. Ex. 21, DTMI00128731-805 (Jones Day 1/29/13 Pitchbook)	
20.	03/2013 - Orr Dep. Ex. 22, DTMI00129416 (Restructuring Plan)	
21.	02/15/13 - Orr Dep. Ex. 25, JD-RD-0000354-55 (email chain)	Authentication ; Hearsay
22.	06/21/13 - Satchel Dep. Ex. 18, DTMI00078573 (email attaching 6/20/13 Retiree Legacy Cost Restructuring)	
23	06/14/13 - Satchel Dep. Ex. 19, Dkt. 438-7(letter Re: Retiree Benefit Restructuring Meeting	
24.	06/17/13 - Satchel Dep Ex. 20, Dkt. 438-6 (letter Re: Request from EFM for additional information)	



25.	09/24/13 - Bowen Dep. Ex. 4, DTMI00066176-90 (letter Re: PFRS Simple 10-Year Projection of Plan Freeze and No Future COLA)	
26.	11/16/12 - Bowen Dep. Ex. 9, DTMI00066269-74 (letter Re: DGRS Simple Projection)	
27.	05/20/13 - Bowen Dep. Ex. 10 DTMI00066285 (Letter Re: DGRS Simple 10-Year Projection of Plan Freeze and No Future COLA)	
28.	05/21/13 - Bowen Dep Ex. 11, (letter from G. Bowen to E. Miller Re: PFRS Simple 10-Year Projection of Plan Freeze and No Future COLA)	
29.	09/24/13 - Bowen Dep. Ex. 14, (letter Re: One-Year Service Cancellation for DRGS and PFRS)	
30.	07/17/13 - Malhotra Dep. Ex. 8, DTMI00137104 (Ernst & Young - Amendment No. 7 to statement of work)	
31.	07/02/13 - Dkt. 438-9 (letter from S. Kreisberg to B. Easterly Re: Request for Information)	
32.	07/03/13 - Dkt. 438-10 (letter from B. Eastley to S. Kreisberg Re: City of Detroit Restructuring)	
33.	01/16/13 - DTMI00078970 - 79162, (Ernst & Young Professional Service Contract)	
34.	04/04/13 - DTMI00210876 - 78, (Ernst & Young Amendment No 6 to Professional Services Contract)	
35.	07/17/13 - Snyder Dep. Ex. 6, (City of Detroit Rollout Plan)	Hearsay
36.	06/07/13 - Snyder Dep. Ex. 7, (Tedder email)	Hearsay
37.	07/08/13 - Snyder Dep. Ex. 8, (Dillon email)	Hearsay

38.	07/09/13 - Snyder Dep. Ex. 9, (Dillon email)	Hearsay
39.	07/09/13 - Dillon Dep. Ex. 5 (Dillon email)	Hearsay
40.	09/13/2013 - Dkt. 849 (City's Response to General Retirement Systems Request For Admissions)	
41.	08/23/13 - Dkt. 611 (General Retirement Systems Request For Admissions)	
42.	06/30/2011 - DTMI00225546 - 96, (Gabriel Roeder Smith 73rd Annual Actuarial Valuation)	
43.	06/30/12 - DTMI00225597 - 645, (Gabriel Roeder Smith 74th Annual Actuarial Valuation)	
44.	03/2013 - Bing Dep. Ex. 3 DTMI00129416 - 53 (City of Detroit - Restructuring Plan	
45.	06/30/12 - Bing Dep. Ex. 4 - (Excerpt of Comprehensive Annual Financial Report - (pages 123-124))	
46.	07/10/13 - Bing Dep. Ex. 5 - DTMI00098861-62, (email correspondence)	
47.	The video as it is linked from the 09/16/13 and 10/4/13 depositions of Kevyn D. Orr	
48.	The video as it is linked from the 10/14/13 Dave Bing Deposition	
49.	The video as it is linked from the 10/9/13 Richard D. Snyder Deposition	
50.	The video as it is linked from 10/10/13 Andrew Dillon Deposition	
51.	Any and all documents, correspondence and/or other materials authored by any witnesses identified in the City's witness list that contain relevant facts and/or information regarding this matter	Non-specific; non-compliant with Local Rule 7016-1(a)(9)

52.	Any and all exhibits identified by any party	
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### ***III. Deposition Designations***

**The Committee hereby submits the following deposition designations:**

09/16/13 Kevyn Orr

p.10, L. 23 - p. 11, L. 14  
p. 12, L. 1 - p. 13, L. 25  
p. 14, L. 14 - p. 15, L. 17  
p. 17, L. 7 - p. 19, L. 19  
p. 20, L. 19 - 25  
p. 21, L. 3 - 6  
p. 21, L. 21 - 24  
p. 23, L. 13 - 19  
p. 23, L. 24 - 25  
p. 24, L. 4 - p. 25, L. 22  
p. 26, L. 20 - 25  
p. 29, L. 6 - p. 31, L. 5  
p. 32, L. 14 - 23  
p. 33, L. 5 - 13  
p. 38, L. 11 - p. 41, L. 17  
p. 43, L. 15 - p. 45, L. 19  
p. 46, L. 7 - p. 47, L. 18  
p. 48, L. 1 - p. 49, L. 8  
p. 50, L. 23 - p. 53, L. 7  
p. 53, L. 16 - 24  
p. 54, L. 2 - 5  
p. 54, L. 13 - 19  
p. 54, L. 22 - p. 55, L. 5  
p. 55, L. 8 - 17  
p. 55, L. 20 - p. 56, L. 19  
p. 56, L. 21  
p. 57, L. 11 - p. 60, L. 13  
p. 61, L. 17 - p. 62, L. 24

p. 63, L. 25 - p. 64, L. 11  
 p. 65, L. 15 - p. 66, L. 1  
 p. 69, L. 3 - p. 71, L. 2  
 p. 71, L. 6 - 8  
 p. 71, L. 17 - p. 78, L. 5  
 p. 78, L. 21  
 p. 79, L. 2 - 6  
 p. 79, L. 16 - p. 80, L. 8  
 p. 80, L. 25 - p. 82, L. 23  
 p. 82, L. 25 - p. 83, L. 3  
 p. 83, L. 16 - p. 84, L. 2  
 p. 84, L. 13 - 16  
 p. 84, L. 18 - 24  
 p. 85, L. 19 - p. 86, L. 1  
 p. 86, L. 16 - p. 95, L. 1  
 p. 96, L. 25 - p. 108, L. 7  
 p. 110, L. 12 - p. 119, L. 10  
 p. 119, L. 20 - p. 120, L. 16  
 p. 120, L. 19 - p. 121, L. 12  
 p. 122, L. 7 - p. 123, L. 14  
 p. 123, L. 17 - p. 125, L. 10  
 p. 125, L. 24 - p. 127, L. 4  
 p. 127, L. 24 - p. 130, L. 23  
 p. 132, L. 12 - p. 133, L. 25  
 p. 134, L. 3 - p. 135 L. 4  
 p. 136, L. 18 - p. 137, L. 1  
 p. 137, L. 12 - p. 144, L. 23  
 p. 145, L. 25 - p. 146, L. 10  
 p. 147, L. 19 - 25  
 p. 148, L. 16 - p. 153, L. 8  
 p. 166, L. 12 - 24  
 p. 168, L. 5 - p. 172, L. 4  
 p. 172, L. 19 - p. 176, L. 20  
 p. 177, L. 21 - p. 178, L. 1  
 p. 179, L. 2 - p. 185, L. 23  
 p. 187, L. 3 - p. 190, L. 12  
 p. 192, L. 2 - 8  
 p. 215, L. 13 - 24  
 p. 247, L. 1 - 7

p. 248, L. 15 - p. 249, L. 5  
p. 251, L. 16 - 18  
p. 252, L. 4 - 5  
p. 252, L. 12 - p. 253, L. 6  
p. 260, L. 8 - 21  
p. 261, L. 21 - p. 262, L. 4  
p. 262, L. 13 - 23  
p. 266, L. 18 - 25  
p. 267, L. 11 - p. 268, L. 1  
p. 270, L. 25 - p. 272, L. 6  
p. 272, L. 20 - p. 273, L. 13  
p. 273, L. 24 - p. 276, L. 8  
p. 277, L. 19 - p. 279, L. 6  
p. 279, L. 23 - p. 280, L. 4  
p. 280, L. 17 - 19  
p. 280, L. 23 - 25  
p. 288, L. 10 - p. 289, L. 6  
p. 302, L. 9 - p. 303, L. 7

10/04/13 Kevin Orr

p. 323, L. 22 – p. 324, L.14  
p. 328, L. 4 - p. 329, L. 3  
p. 330, L. 13 - 17  
p. 331, L. 18 - p. 332, L. 1  
p. 332, L. 2  
p. 333, L. 11 - p. 335, L. 9  
p. 361, L. 7 - p. 362, L. 22  
p. 364, L. 5 - p. 365, L. 7  
p. 368, L. 10-15  
p. 369, L. 12 - p. 381, L. 2  
p. 409, L. 9 - p. 412, L. 18  
p. 415, L. 7 - p. 417, L. 11  
p. 419, L. 2 - 7  
p. 455, L. 3 - p. 457, L. 1  
p. 464, L. 17 - 19  
p. 477, L. 8 - p. 481, L. 22  
p. 489, L. 8 - 22

09/18/13 Charles M. Moore Deposition Designations

p. 8, L. 4 - 8  
p. 12, L. 3 - 6  
p. 36, L. 9 - 12  
p. 50, L. 2 - p. 51, L. 1  
p. 51, L. 10 - 17  
p. 52, L. 5 - 20  
p. 53, L. 25 - p. 54, L. 11  
p. 61, L. 18 - p. 62, L. 7  
p. 62, L. 25 - p. 63, L. 12  
p. 64, L. 6 - 7  
p. 64, L. 9 - 14  
p. 64, L. 16 - 20  
p. 65, L. 4 - 11  
p. 70, L. 16 - 18  
p. 91, L. 20 - 23  
p. 110, L. 12 - 22  
p. 126, L. 22 - p. 127, L. 14  
p. 130, L. 25 - p. 131, L. 14  
p. 138, L. 7 - p. 139, L. 9  
p. 140, L. 16 - p. 141, L. 2  
p. 141, L. 8 - 19  
p. 150, L. 24 - p. 151, L. 5  
p. 151, L. 7 - 18  
p. 151, L. 20 - p. 152, L. 1  
p. 152, L. 8 - 21  
p. 156, L. 18 - 25

10/10/13 Andrew Dillon

p. 7, L. 18 - 20  
p. 60, L. 10 - p. 61, L. 2  
p. 61, L. 9 - p. 63, L. 10  
p. 64, L. 10 - 15  
p. 68, L. 23 - p. 69, L. 1  
p. 69, L. 23 - p. 71, L. 12  
p. 89, L. 15 - p. 90, L. 24  
p. 91, L. 10 - p. 93, L. 1

p. 94, L. 11 - p. 96, L. 9  
p. 119, L. 1 - p. 120, L. 14

09/24/13 Glen David Bowen

p. 12, L. 7 - 9  
p. 19, L. 12 - 20  
p. 34, L. 8 - 21  
p. 63, L. 21 - p. 64, L. 5  
p. 73, L. 7 - 21  
p. 91, L. 18 - p. 92, L. 13  
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p. 98, L. 13 - p. 99, L. 3  
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p. 100, L. 18 - 22  
p. 129, L. 14 - 22  
p. 130, L. 8 - p. 132, L. 11  
p. 133, L. 10 - p. 134, L. 18  
p. 141, L. 9 - 17  
p. 142, L. 8 - 10  
p. 142, L. 13 - 19  
p. 143, L. 1 - 6  
p. 143, L. 8 - 19  
p. 146, L. 8 - 19  
p. 147, L. 2 - p. 148, L. 15  
p. 148, L. 19 - 22  
p. 149, L. 2 - 3  
p. 149, L. 6 - 8  
p. 150, L. 5 - 15  
p. 177, L. 18 - p. 178, L. 3  
p. 192, L. 8 - p. 193, L. 11  
p. 194, L. 4 - 12  
p. 198, L. 5 - 7  
p. 198, L. 17 - 19  
p. 203, L. 20 - p. 204 L. 9  
p. 204 L. 11 - 14  
p. 204, L. 16 - 19  
p. 205, L. 7 - p. 206, L. 11

09/19/13 Lamont Satchel

p. 65, L. 7 - p. 66, L. 9  
p. 88, L. 14 - p. 89, L. 18  
p. 89, L. 25 - p. 90, L. 1  
p. 90, L. 4 - p. 91, L. 3

09/09/13 Guarav Malhotra

p. 12, L. 22 - p. 13, L. 5  
p. 17, L. 4 - 11  
p. 19, L. 15 - p. 21, L. 12  
p. 25, L. 7 - p. 26, L. 8  
p. 40, L. 4 - 10  
p. 50, L. 21 - p. 53, L. 20  
p. 110 L. 8 - p. 115, L. 15  
p. 115, L. 20 - p. 116, L. 3  
p. 116, L. 10 - p. 119, L. 11  
p. 119, L. 17 - p. 120, L. 11  
p. 190, L. 18 - p. 192, L. 8  
p. 196, L. 23 - p. 198, L. 13  
p. 209, L. 3 - 18  
p. 227, L. 12 - p. 228, L. 6

09/09/13 Guarav Malhotra

p. 10, L. 12 - 21  
p. 11, L. 14 - p. 12, L. 18  
p. 24, L. 18 - p. 25, L. 18  
p. 28, L. 5 - p. 29, L. 18  
p. 38, L. 12 - 21  
p. 44, L. 21 - p. 47, L. 11  
p. 51, L. 7 - p. 55, L. 12  
p. 60, L. 4 - p. 63, L. 3  
p. 80, L. 8 - 21  
p. 106, L. 10 - p. 108, L. 11

09/20/13 Kenneth Buckfire



p. 10, L. 2 - 6  
p. 37, L. 12 - p. 38, L. 4  
p. 40, L. 2 - p. 40, L. 16  
p. 58, L. 13 - p. 63, L. 3  
p. 66, L. 6 - p. 68, L. 8  
p. 74, L. 24 - p. 77, L. 2  
p. 77, L. 8 - 22  
p. 95, L. 7 - p. 97, L. 22  
p. 98, L. 9 - p. 99, L. 19  
p. 101, L. 7 - p. 102, L. 15  
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10/09/13 Richard D. Snyder

p. 9, L. 24 - p. 10, L. 1  
p. 11, L. 20 - p. 12, L. 12  
p. 13, L. 3 - 17  
p. 13, L. 20 - 22  
p. 29, L. 18 - p. 30, L. 2  
p. 46, L. 3 - 6  
p. 46, L. 16 - 19  
p. 46, L. 24 - p. 47, L. 5  
p. 51, L. 17 - p. 53, L. 3  
p. 55, L. 20 - p. 56, L. 1  
p. 57, L. 4 - 6  
p. 57, L. 9 - 11  
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p. 60, L. 16 - 23  
p. 61, L. 1 - 4  
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p. 63, L. 9 - p. 64, L. 10  
p. 64, L. 14 - 18  
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p. 76, L. 11 - 13  
p. 77, L. 6 - 19  
p. 78, L. 14 - p. 79, L. 14  
p. 79, L. 25 - p. 80, L. 6  
p. 85, L. 10 - 18  
p. 87, L. 1 - 9  
p. 92, L. 16 - 20  
p. 109, L. 10 - p. 110, L. 6  
p. 120, L. 11 - 19  
p. 122, L. 10 - 13  
p. 122, L. 18 - 20  
p. 124, L. 3 - 17  
p. 125, L. 21 - p. 126, L. 10  
p. 126, L. 18 - 21  
p. 127, L. 13 - 15  
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10/10/13 Andrew Dillon Deposition Designations

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p. 69, L. 23 - p. 71, L. 12

p. 89, L. 15 - p. 90, L. 24

p. 91, L. 10 - p. 93, L. 1

p. 94, L. 11 - p. 95, L. 25

p. 96, L. 5 - 9

p. 119, L. 1 - p. 120, L. 14

10/14/13 Howard Ryan Deposition Designations

p. 7, L. 15 - p. 8, L. 7

p. 18, L. 14 - p. 19, L. 4

p. 25, L. 9 - p. 28, L.17  
p. 30, L. 13 - p. 31, L. 3  
p. 35, L. 25 - p. 37, L. 20  
p. 46, 6 - p. 46, L. 23

10/14/13 Dave Bing Deposition Designations

p. 11, L. 9 - p. 13, L. 7  
p. 50, L. 7 - p. 51, L. 8  
p. 53, L. 15 - p. 58, L. 11  
p. 59, L. 25 - p. 64, L. 23  
p. 66, L. 21 - p. 68, L. 9  
p. 72, L. 13 - p. 75, L. 11  
p. 75, L. 22 - p. 90, L. 3  
p. 91, L. 4 - 24

## ATTACHMENT D

**THE MICHIGAN COUNCIL 25 OF THE AMERICAN FEDERATION OF  
STATE, COUNTY AND MUNICIPAL EMPLOYEES' CONSOLIDATED  
(1) WITNESS LIST (2) EXHIBIT LIST AND (3) DEPOSITION  
DESIGNATIONS**

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**THE MICHIGAN COUNCIL 25 OF THE AMERICAN FEDERATION OF  
STATE, COUNTY AND MUNICIPAL EMPLOYEES' CONSOLIDATED  
(1) WITNESS LIST (2) EXHIBIT LIST AND (3) DEPOSITION  
DESIGNATIONS**

The Michigan Council 25 of the American Federation of State, County and Municipal Employees ("AFSCME"), through their counsel, Lowenstein Sandler LLP, for the Eligibility Hearing scheduled to start October 23, 2013, submit the following Consolidated (1) Witness List, (2) Exhibit List and (3) Deposition Designations:

***I. Witness List***

A. The AFSCME hereby submits this consolidated witness list of individuals who will be called as live witnesses in the eligibility trial:

1. Steven Kreisberg

B. The AFSCME hereby submits this consolidated witness list of individuals who will be called as witnesses via deposition testimony in the eligibility trial:

1. Governor Richard D. Snyder
2. Emergency Manager Kevyn D. Orr
2. Ernst & Young LLP Principal Guarav Malhotra
3. Conway MacKenzie Senior Managing Director Charles Moore
4. Michigan Treasurer Andy Dillon
5. Richard Baird

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6. Mayor David Bing

7. Howard Ryan

C. The AFSCME hereby submits this consolidated witness list of individuals who may be called as witnesses via deposition testimony in the eligibility trial:

1. Edward McNeil

D. The AFSCME hereby reserves the right to call as witnesses any witness called by any other party.

## ***II. Exhibit List***

The AFSCME hereby submits this consolidated exhibit list of evidence that will or may be used as evidence during the eligibility trial:

<b>AFSCME <u>Exhibit No.</u></b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
1.	08/2007 - Dep. Ex. 8, (Office of the Auditor General Audit of the Municipal Parking Department) Deposition of Kenneth A. Buckfire, September 20, 2013	Relevance
2.	12/16/11 - AFSCME000000368 – 373, (City of Detroit Budgetary Savings and Revenue Manifesto – City of Detroit Labor Organizations)	Authentication; Hearsay; Relevance
3.	12/21/11 - Ex. C, (2011 Treasury Report) Declaration of Kevyn Orr in Support of Eligibility	

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4.	01/10/12 - Dep. Ex. 10, (City of Detroit Letter Request for Information to Cockrel, Budget, Finance and Audit Standing Committee Chair) Deposition of Kenneth A. Buckfire, September 20, 2013	
5.	02/01/12 - DTMI00086926 – 86983, (Tentative Agreement between City and Coalition of City of Detroit (non-uniform) Unions)	Hearsay; Relevance
6.	03/02/12 - DTMI00234878 – 234880, (Email amongst Jones Day Subject: Consent Agreement)	
7.	03/26/12 - Dep. Ex. 5, (Letter from Lamont Satchel to Edward McNeil Confirming Coalition of Unions representing Detroit City workers has ratified a new contract) Deposition of Lamont Satchel, September 19, 2013	Relevance
8.	04/02/12 - Dep. Ex. 6, (Letter to Lamont Satchel from Edward McNeil providing updated list of coalition unions) Deposition of Lamont Satchel, September 19, 2013	Relevance
9.	03/26/12 - DTMI00204529 - 204543, (2012 Financial Review Team Report, dated March 26, 2012)	
10.	04/05/12 - DTMI00161620 - 161678, (2012 Consent Agreement)	
11.	06/06/12 - Dep. Ex. 9, (City of Detroit Non-filer Collection Summary for years	Authentication; Hearsay;

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	2006 to 2009) Deposition of Kenneth A. Buckfire, September 20, 2013	Relevance
12.	06/11/12 - DMTI00098703- 98704 Email from Kyle Herman of Miller Buckfire to Heather Lennox & others Forwarding article "Bing: Detroit Will Miss Friday Payment if Suit Not Dropped"	Hearsay
13.	07/18/12 - AFSCME000000291-337, (Letter from Satchel attaching City Employment Terms)	Relevance
14.	07/27/12 - AFSCME 000000340 – 343, (Inter-Departmental Communication from Lamont Satchel to City of Detroit Employees regarding employment terms)	Relevance
15.	08/02/12 - Dep Ex. 12, (August 2, 2012 CET Implementation Project Kickoff Meeting) Deposition of Lamont Satchel, September 19, 2013	Relevance; Hearsay
16.	08/20/12 - AFSCME 000000344 - 347, (Cynthia Thomas Memorandum re: Changes in Pension Provisions to Unionized Employees Subject to City Employment Terms)	Hearsay; Relevance
17.	08/29/12 - DTMI00090577 – 90584, (Cynthia Thomas Revised Memorandum re: Changes in Pension Provisions to Unionized Employees Subject to City Employment Terms)	Hearsay; Relevance
18.	11/21/12 - DMTI00103931 - 103932, (Email Exchange with James Doak to	Hearsay; Relevance

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	Buckfire & others re: furloughs)	
19.	12/02/12 - Moore Dep. Ex. 6, DTMI00078512 - 8514 (Email from Kriss Andrews to Andy Dillon re: respective roles of E&Y, Conway MacKenzie, and Miller Buckfire in restructuring)	
20.	12/14/12 - DTMI00220457 - 220459, (2012 Treasury Report)	
21.	12/18/12 - Dep. Ex. 12, (Letter from Edward McNeil to Lamont Satchel) Deposition of Lamont Satchel, September 19, 2013	
22.	12/19/12 - Dep. Ex. 13, (Budget Required Furlough) Deposition of Lamont Satchel, September 19, 2013	
23.	12/19/12 - Moore Dep. Ex. 7, DTMI00106319 - 106320, (Email from Van Conway to Moore Re: draft "Exhibit A" concerning proposed scope of services for Conway MacKenzie as part of K with City of Detroit)	
24.	12/19/12 - Moore Dep. Ex. 8, DTMI00079526, (Email from Moore to Kriss Andrews etc Re: draft "Exhibit A" concerning proposed scope of services for Conway MacKenzie as part of K with City of Detroit)	
25.	12/19/12 - Moore Dep. Ex. 9, (Email from Kriss Andrews to Baird Re: scope of work for Conway MacKenzie)	

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26.	12/19/12 - Moore dep. Ex. 10, DTMI00079528 - 79530 (Exhibit A Conway MacKenzie Scope of Services for January 9, 2013 through December 31, 2013)	
27.	12/27/12 - Dep. Ex. 17 (Caremark/CVS Letter), Deposition of Lamont Satchel, September 19, 2013	Hearsay; Relevance
28.	01/2013 - Dep Ex. 5, (Water Supply System Capital Improvement Program Fiscal Years 2013 through 2017 (January 2013 Update) Deposition of Kenneth A. Buckfire, September 20, 2013	Hearsay; Relevance
29.	01/2013 - Dep. Ex. 6, (Sewage Disposal System, Capital Improvement Program, Fiscal years 2013 through 2017 (January 2013 Update) Deposition of Kenneth A. Buckfire, September 20, 2013	Hearsay; Relevance
30.	01/03/13 - Dep Ex. 14, (Letter from Lamont Satchel to Ed McNeil in Response to December 28, 2012 Letter) Deposition of Lamont Satchel, September 19, 2013	Relevance
31.	01/14/13 - DMTI00079665 - 79667(email from Kriss Andrews re: Professionals Call on Retiree Health Care Issues)	
32.	01/22/13 - DMTI00079569 - 79574, (Email from Kriss Andrews to Himself attaching Executive Summary of Detroit Restructuring Plan)	
33	01/23/13 - Dep. Ex. 15, (Letter from	

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	Lamont Satchel to Ed McNeil responding to information request submitted December 18, 2012) Deposition of Lamont Satchel, September 19, 2013	
34.	01/25/13 - Dep. Ex. 16, (Letter from Ed McNeil to Lamont Satchel in preparation for meeting January 30, 2013) Deposition of Lamont Satchel, September 19, 2013	
35.	01/16/13 - Moore Dep. Ex. 11, DTMI00078909 - 78969 (Conway MacKenzie Professional Service Contract Transmittal Record approved January 16, 2013)	
36.	01/29/13 - DTMI00128731-128805, (Pitch Presentation given to the City by the City's Law Firm)	
37.	1/30/13 - JD-RD-0000113, (Email From Richard Baird forwarded by Corinne Ball to Heather Lennox "Bet he asked if Kevyn could be EM!")	
38.	01/31/12 - JD-RD-0000177 -178, (10:52 email between Orr and his colleague)	
39.	01/31/13 - JD-RD-0000295 - 296 (3:45:47 PM Email between Kevyn Orr and Corinne Ball Re: Bloomberg involvement as a bad idea & new law as a "redo" of prior rejected law)	
40.	01/31/13 - JD-RD-0000303, (5:23:09 PM Email between Kevyn Orr and colleague re conversation with Richard Baird re:	

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	consideration of EM job; in response to email from Corinne Ball re: Bloomberg Foundation and financial support for EM & project)	
41.	01/31/13 - JD-RD-0000300 - 302 (4:10:58 PM Email exchange between Orr and Daniel Moss Re: prudence of making Detroit a “national issue” to provide “political cover” & best option to go through chapter 9)	
42.	02/11/13 - DMTI00083374 - 83394, (City of Detroit FAB Discussion Document)	
43.	02/07/13 - JD-RD-0000334 - 336, (Email String between Richard Baird and Kevyn Orr re: Details of Emergency Manager Employment) February 12-13	
44.	02/12/13 - JD-RD-0000327, ( Email string between Richard Baird, Andy Dillon, Kevyn Orr and Others regarding schedule for Orr Visit on February 11, 2013) February 7, 2013-February 11, 2013	
45.	02/13/13 - JD-RD-0000354-355, (Email String Regarding Prospect of Orr accepting position as Emergency Manager) February 13, 2013-February 15, 2013	
46.	02/18/13 - Moore Dep. Ex. 18, DTMI00103661 - 103663, (Email from Moore to Bill Pulte re: Pulte Capital Partners LLC employment to clear blight)	

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47.	02/19/13 - DTMI00080488 - 80508, (2013 Financial Review Team Report)	
48.	02/19/13 - DTMI00080488 - 80508, (Supplemental Documentation of the Detroit Financial Review team Report)	
49.	02/20/13 - JD-RD-0000216 - 218, (Email attaching summary of partnership – Governor, Mayor & EM)	
50.	02/22/13 - JD-RD-0000459 - 464, (Email exchange concerning summary of partnership Exchange with Orr and Baird, forwarding exchange between Baird and Snyder) February 20- 22, 2013	
51.	02/22/13 - DTMI00097150 - 97154, (Letter from Irvin Corley, Director Fiscal Analysis Division and David Whitaker, Director Research & Analysis Division to Councilmembers Providing Comments on the Report of the Detroit Financial Review Team report)	
52.	03/2013 - DMTI00078433 - 78470, (City of Detroit Restructuring Plan, Mayor's Implementation Progress Report)	
53.	03/01/13 - DTMI 00124558 - 24562, (Governor's Determination of Financial Emergency)	
54.	03/11/13 - Moore Dep. Ex. 13, DTMI00078028–78046, (FAB Discussion Document)	

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55.	03/27/13 - JD-RD-0000524 - 532, (Contract for Emergency Manager Services)	
56.	04/05/13 - Moore Dep. Ex. 14 - DTMI00069987 – 70027, (City Council Review Restructuring Recommendations)	
57.	04/08/13 - Moore Dep. Ex. 14 - DTMI00083414 – 83434 - (FAB Discussion Document)	
58.	04/11/13 - , (Order No. 5, issued by the EM April 11, 2013, requires that the EM approve in writing of any transfers of the City’s real property)	
59.	05/02/13 - (Order No. 6, issued by the EM on May 2, 2013, directs the precise amount of deposits from the City to the Public Lighting Authority)	
60.	05/12/13 - DTMI00222548 - 222591, (Financial and Operating Plan)	
61.	05/21/13 - Moore Dep. Ex. 4, DTMI00106352 - 6353, (email from Van Conway to Moore)	
62.	05/21/13 - DTMI00106348 - 6349 (email exchange between Moore and Baird re: hiring of “Van” (Conway))	
63.	05/24/13 - Debtor’s Omnibus Reply to Objections Ex. C, (Letter from Edward McNeil estimating savings from the Tentative Agreement of Approximately	

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	\$50 million)	
64.	06/03/13 - Dep. Ex. 5, SOM20001327-1327-28, (Email String re: Financial and Operating Plan Powerpoint January 3, 2013 through June 7, 2013) Deposition of Treasurer Andrew Dillon, October 10, 2013	Hearsay
65.	06/10/13 - DTMI0011511-115432, (June 10 Presentation)	
66.	06/14/13 - DTMI00083043 - 83044, (letter from counsel to the City of Detroit to AFSCME)	
67.	06/14/13 - DTMI00227728 - 227861, (City of Detroit's "Proposal for Creditors" presented by the City of Detroit on June 14, 2013)	
68.	06/14/13 - DTMI00083741 - 83805, (Executive Summary of City of Detroit's "Proposal for Creditors" presented by the City of Detroit on June 14, 2013)	
69.	06/17/13 - AFSCME000000040 - 41 Kreisberg letter to Miller Buckfire & Co., LLC.	
70.	06/20/13 - DTMI00078574 - 78597, (Retiree Legacy Cost Restructuring, Uniform Retirees June 20, 2013 Presentation)	
71.	06/20/13 - DTMI00078598 - 78621, (Retiree Legacy Cost Restructuring, Non-Uniform Retirees June 20, 2013)	

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	Presentation)	
72.	06/21/13 - DMTI00099297 - 99298, (Email Sonya Mays to herself Re: refining current responsibilities to align more closely with City's financial restructuring effort)	
73.	06/21/13 - DTMI00078573 - 78621, (email from Lamont Satchel to David Bing and others attaching Emergency Manager's current restructuring plan for healthcare benefits and pensions)	
74.	06/27/13 - DTMI00084443, (letter from counsel to the City of Detroit to AFSCME) (Letter to Ed- not letter included in objection)	
75.	06/28/13 - DTMI00135831, (June 28, 2013 email from counsel to the City of Detroit to AFSCME)	
76.	06/30/13 - DTMI00175701 - 175736, (City of Detroit Water Fund Basic Financial Statements)	Authentication; Hearsay; Relevance
77.	06/30/13 - DTMI00175663 - 74700, (City of Detroit Sewage Disposal Fund Basic Financial Statements)	Authentication; Hearsay; Relevance
78.	07/02/13 - AFSCME000000036 - 39, (Kreisberg letter to counsel to the City of Detroit)	
79.	07/03/13 - DTMI00084320 - 84321, (letter from counsel to the City of Detroit to	

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	AFSCME)	
80.	07/04/13 - DTMI00109900 -109901, (Email from Dana Gorman to Bill Nowling attaching Communications Rollout)	Hearsay
81.	07/08/13 - Dep. Ex. 7, SOM200003601, (Email re: Detroit and Pension Cuts) Deposition of Richard Baird, October 10, 2013	Hearsay
82.	07/08/13 - SOM20010097, (Email from Bill Nowling to Governor's Office Attaching July 4, 2013 Spreadsheet entitled "Chapter 9 Communications Rollout")	Hearsay
83.	07/18/13 - (Order No. 10, issued by the EM on July 8, 2013, suspends the Detroit Charter's requirement for filling vacancies on City Council)	
84.	07/09/13 - SOM20010234, (Email from Treasurer Andy Dillon to the Governor and other Individuals in the Governor's Office)	Hearsay
85.	07/09/13 - Dep. Ex. 8, SOM200003657, (email re: Detroit and Referencing Meeting Keyvn Orr to have with pensions) Deposition of Richard Baird, October 10, 2013	Hearsay
86.	07/11/13 - DMTI00104215-104217, (Email from Dave Home to Kenneth Buckfire forwarding pre-read for call	Hearsay

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	regarding options for protecting art)	
87.	07/16/13 - DTMI00099244 - 99255, (Emergency Manager Recommendation of Chapter 9 Filing)	
88.	07/17/13 - DTMI00128729-128730, (Email from Ken Buckfire regarding the deal reached between the City and its swap counterparties)	Hearsay
89.	07/17/13 - DTFOTA00000001 - 8, (Ernst & Young Amendment No. 7 to Professional Services Contract with City of Detroit)	
90.	07/18/13 - DTMI00116442 - 116445, (Governor's Authorization of Chapter 9 Filing)	
91.	07/18/13 - Decl. Ex. A (Temporary Restraining Order dated July 18, 2013) Kreisberg Declaration, August 19, 2013	
92.	07/19/13 - Ex. B (Order of Declaratory Judgment dated July 19, 2013) Kreisberg Declaration, August 19, 2013	
93.	07/19/13 - DTMI00116442-116445, (email re: High Priority with attached July 18, 2013 Letter re Authorization to Commence Chapter 9 Bankruptcy Proceeding)	
94.	08/06/13 - AFSCME0000000050, (Kreisberg letter to counsel to the City of Detroit) (no attachment)	Relevance
95.	08/08/13 - AFSCME0000000045 - 46,	Relevance

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	(letter from counsel to the City of Detroit to AFSCME)	
96.	09/11/13 - Ex. 14, (Retiree Legacy Cost Restructuring Presentation) Deposition of Kevyn Orr, September 16, 2013	Relevance
97.	09/13/13 - DTFOTA1 – 153, (Letter from Jones Day to Caroline Turner attaching documents relied upon in Buckfire and Malhotra Depositions) Deposition of Kenneth A. Buckfire, September 20, 2013	
98.	10/09/13 - Ex. 11, (Email Subject: High Priority) Deposition of Governor Richard Snyder, October 9, 2013	
99.	DTMI00117210 -117215, (Detroit City Council Rationale for Appeal)	Authentication; Relevance
100.	Ex. 18, (City Government Restructuring Program Hot Items) Deposition of Kenneth A. Buckfire, September 20, 2013	Authentication; Hearsay
101.	NERD Tax Return	Authentication; Hearsay; Relevance
102.	09/16/13 - Ex. B, (Deposition Transcript of Emergency Manager Kevyn Orr September 16, 2013) Declaration of Michael Artz.	
103.	10/04/13 - Ex. E, (Transcript of continued deposition testimony given by Emergency Manager Kevyn Orr) Declaration of Michael Artz.	

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104.	10/09/13 - Ex. A, (Deposition Transcript of Governor Richard Snyder) Declaration of Michael Artz.	
105.	09/20/13 - Ex. C, (Deposition Transcript of Guarav Malhotra) Declaration of Michael Artz.	Hearsay
106.	09/18/13 - Ex. D, (Deposition of Charles Moore) Declaration of Michael Artz.	Hearsay

### ***III. Deposition Designations***

**The AFSCME hereby submits the following deposition designations**

9/16/13 10/4/13 Kevyn Orr deposition:

p. 18, L. 12 - p. 21, L. 20  
p. 21, L. 3-6  
p. 24, L. 24 – 25  
p. 31, L. 5  
p. 137, L. 25 – p. 138, L. 8  
p. 220, L. 19 - p. 221, L. 10  
p. 237, L. 15 – p. 237, L. 5  
p. 252, L. 25 – p. 253, L. 16  
p. 288, L. 2- 9  
p. 301, L. 19 – p. 302, L. 8  
p. 377, L. 1 – p. 380, L. 13

9/20/13 Gaurav Malhotra deposition:

p. 44, L. 21 – p. 45, L. 17  
p. 86, L. 20 – 23

9/18/13 Charles Moore deposition:

p. 62, L. 2-7  
p. 63, L. 10-12

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10/9/13 Governor Richard Snyder deposition:

p. 46, L. 3 - 23  
p. 52, L. 13 - 15  
p. 63, L. 9 – p. 64, L. 18

10/10/13 Treasurer Andrew Dillon deposition

p. 63, L. 5 – p. 66, L. 1  
p. 68, L. 23 – p. 71, L. 12  
p. 119, L. 1 – p. 121, L. 17

10/10/13 Andrew Baird deposition:

p. 13, L. 11- p. 15, L. 10  
p. 16, L. 2 - 18  
p. 19, L. 2 – 20

10/14/13 Mayor Dave Bing deposition:

p. 12, L. 7 – p. 13, L. 24  
p. 14, L. 9 - 21  
p. 20, L. 19 – 24  
p. 45, L. 24 – p. 46, L. 10  
p. 76, L. 2 – p. 68, L. 9  
p. 69, L. 8 – p. 70, L. 25  
p. 100, L. 15 – p. 101, L. 13  
p. 103, L. 15 – p. 106, L. 6  
p. 106, L. 11 – p. 108, L. 9  
p. 107, L. 16 – p. 108, L. 1

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## ATTACHMENT E

### **THE UAW'S AND *FLOWERS* PLAINTIFFS' CONSOLIDATED (1) WITNESS LIST, (2) EXHIBIT LIST AND (3) DEPOSITION**

**THE UAW'S AND *FLOWERS* PLAINTIFFS' CONSOLIDATED  
(1) WITNESS LIST, (2) EXHIBIT LIST AND (3) DEPOSITION  
DESIGNATIONS**

***I. Witness List***

A. The UAW and Flowers hereby submit this consolidated list of individuals who will be called as witnesses in the eligibility trial:

1. Michael Nicholson - Subject: City's pre-petition meetings with stakeholders and status of the employees and retirees of the Detroit Public Library
2. Jack Dietrich – history of bargaining between UAW Local 2211 and City
3. Janet Whitson –impact of pension cuts on retirees, including Detroit Public Library Retirees
4. Michigan Governor Rick Snyder – motivation for Chapter 9 filings and dealings between Emergency Manager and state officials
5. Michigan Treasurer Andy Dillon – motivation for Chapter 9 filings and dealings between Emergency Manager and state officials
6. Michigan Transformation Manager Rick Baird – motivation for Chapter 9 filings and dealings between Emergency Manager and state officials

C. The UAW hereby reserves the right to call as witnesses any witness called by any other party.

***II. Exhibit List***



The UAW hereby submits this consolidated exhibit list of evidence that will or may be used as evidence during the eligibility trial:

<b><u>UAW Exhibit No.</u></b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
1.	Orr deposition Exh. 21 (Jones Day 1/29/13 pitchbook)	
2.	Orr deposition Ex. 1, JD-RD-0000113 (email chain)	
3.	Orr deposition Ex. 2, JD-RD-000303 (email chain)	
4.	Orr deposition Ex. 3, JD-RD-0000300-302 (email chain)	
5.	Orr deposition Ex. 6, JD-RD-0000216-218 (email chain)	
6.	Orr deposition Ex. 8, (no Bates stamp) (5/12/13 EM Financial and Operating Plan)	
7.	Orr deposition Ex. 9 (6/14/13 Proposal for Creditors)	
8.	Orr deposition Ex. 10 (no Bates stamp) (7/16/13 EM letter to Governor)	
9.	Orr deposition Ex. 11 (no Bates stamp) (7/18/13 Governor letter to EM)	
10.	Orr's 7/18/13 declaration [Docket No. 11]	
11.	Orr deposition Ex. 17, City's responses to Retirement System's Admissions Requests [Docket No. 15]	
12.	Orr deposition Ex. 18, DTMI00082699 (6/27/13 Jones Day letter to John Cunningham)	
13.	7/8/13 email from Treasurer Dillon to Governor Snyder, (SOM20003601)	Hearsay
14.	Buckfire deposition Ex. 13, DTM00103931-932 (Email chain)	Hearsay
15.	Lamont Satchel deposition Ex. 18 (June	Hearsay

	20, 2013 proposal).	
16.	Rick Snyder Dep. Ex. 10, City of Detroit Chapter 9 Communications Rollout Plan	Hearsay
17.	Rick Snyder Dep. Ex. 9, 7/9/13 email from Dillon to Snyder	Hearsay
18.	Rick Snyder Dep. Ex. 8, 7/8/13 email from Dillon to Snyder	Hearsay
19.	Rick Snyder Dep. Ex. 7	Hearsay
20.	Rick Snyder Dep. Ex. 6	Hearsay
21.	Rich Baird deposition Ex. 5 2/20/13 email from Baird to Orr	Relevance
22.	Rich Baird deposition Ex. 6, 2/22/13 email from Baird to Orr	Relevance
23.	Andy Dillon deposition Ex. 5, 7/19/email	Hearsay
24.	Andy Dillon deposition Ex. 7, 3/2/12 email	Hearsay; Relevance
25.	UAW document production bates-stamped 302-303 (Michael Nicholson question cards)	
26.	7/18/13 Michael Nicholson affidavit, with attachments A and B	Hearsay; Relevance

### ***III. DEPOSITION DESIGNATIONS***

**The UAW hereby submits the following deposition designations:**

9/16/13 Kevyn Orr deposition:

p.17; L.15-18

p.25, L.23 – p.26, L.18

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p.136, L.18 – p.137, L.1  
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p.155, L.16 – p156, L.22  
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p.168, L.5 – p.170, L.9  
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p.239, L.7 – 15  
p.246, L.12 – p.247, L.7  
p.252, L.16 – p.253, L.6  
p.257, L.17 – 20  
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p.446, L.1 – p.447, L.10

p.478, L.7 – p.479, L.1

p.479, L.13 – p.479, L.21

9/20/13 Gaurav Malhotra deposition

p.54, L.22 – p.5, L.12

p.56, L.9 – p.57, L.1

9/18/13 and 10/4/13: Charles Moore deposition

p. 61 L. 18 - p. 62 L.7

p. 65 L. 12 – 23

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p. 150 L. 16 - p. 152 L. 21

9/20/13: Kenneth Buckfire

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9/24/13: Glenn Bowen

p. 34 L. 8 -21  
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9/19/13 Lamont Satchel

p. 11 L. 11 -p. 14 L. 13  
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Deposition transcript of Howard Ryan, Treasury Department of Michigan, Director  
of Office of Legislative Affairs (in its entirety)

#### **IV. RESERVATION OF RIGHTS**

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UAW and the *Flowers* Plaintiffs anticipate filing motions challenging certain assertions of privilege made by the City and/or by the State. Should the Court as a result of such motions find that the City and/or State improperly withheld testimony or documents, the UAW and *Flowers* Plaintiffs reserve the right to supplement or modify their exhibit and witness lists and statement of claim.

# ATTACHMENT F

## THE DETROIT PUBLIC SAFETY UNIONS' CONSOLIDATED (1) WITNESS LIST, (2) EXHIBIT LIST AND (3) DEPOSITION DESIGNATIONS

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**THE DETROIT PUBLIC SAFETY UNIONS' CONSOLIDATED  
(1) WITNESS LIST, (2) EXHIBIT LIST AND (3) DEPOSITION  
DESIGNATIONS**

The Detroit Public Safety Unions, consisting of the Detroit Fire Fighters Association (the "DFFA"), the Detroit Police Officers Association (the "DPOA"), the Detroit Police Lieutenants & Sergeants Association (the "DPLSA") and the Detroit Police Command Officers Association (the "DPCOA") through their counsel, Erman, Teicher Miller, Zucker & Freedman, P.C., submit the following Consolidated (1) Witness List, (2) Exhibit List and (3) Deposition Designations:

***I. Witness List***

A. The Detroit Public Safety Unions' hereby submit this consolidated witness list of individuals who will be called as witnesses in the eligibility trial:

1. Daniel F. McNamara (see Declaration, Dkt. 512-6)  
c/o Erman, Teicher Miller, Zucker & Freedman, P.C  
400 Galleria Officentre, Suite 444  
Southfield, MI 48034  
Telephone: (248) 827-4100

Mr. McNamara will testify about his duties as president of the DFFA, his responsibilities and the responsibilities of the DFFA on behalf of its members, and his dealings with representatives of the City prior to and after the filing of the chapter 9 petition. In particular, he will testify about correspondence with Lamont Satchel that addressed the termination of 2009 – 2013 Collective Bargaining Agreement effective 11:59 p.m. June 30, 2013; the City's terms and conditions of employment following the expiration of the CBA; and follow up meetings. Mr. McNamara will testify about the City's unilateral imposition of wage cuts, cuts to health care benefits and pension restructuring proposals, and that there were no negotiations between the City and the DFFA, despite the DFFA's willingness to participate at meetings.

2. Mark Diaz (see Declaration, Dkt. 512-1)  
c/o Erman, Teicher Miller, Zucker & Freedman, P.C  
400 Galleria Officentre, Suite 444  
Southfield, MI 48034  
Telephone: (248) 827-4100

Mr. Diaz will testify about his duties as president, his responsibilities and the responsibilities of the DPOA on behalf of its members, and his efforts to negotiate and arbitrate labor matters with the City. In particular, Mr. Diaz will testify about the Act 312 Arbitration and the awards that were issued as a result of same. He will testify that the City's lack of negotiations; the City's announcement of its intention to impose new health care plans on the DPOA and other Public Safety Unions which significantly increase the members' out of pocket medical costs; and about the "informational meetings" in June and July 2013, at which representatives from Jones Day presented very general outlines of the City's restructuring proposal.

3. Mark Young (see Declaration, Dkt. 512-7)  
c/o Erman, Teicher Miller, Zucker & Freedman, P.C  
400 Galleria Officentre, Suite 444  
Southfield, MI 48034  
Telephone: (248) 827-4100

Mr. Young will testify about his duties as president, his responsibilities and the responsibilities of the DPLSA on behalf of its members. Mr. Young will testify about the DPLSA Feb. 4, 2013 Petition for Act 312 arbitration and the subsequent action of the City claiming it was not obligated to engage in bargaining under the Public Employment Relations Act, MCL 423.201 et seq as a result of Section 27(3) of Public Act 436; the decision of the MERC on July 14, 2013 granting the City's motion to dismiss the Act 312 arbitration; and the City's subsequent statements that it had no obligation to bargain with the DPLSA. He will also testify about the City's actions in June and July 2013 relative to the termination of the CBA and the City's intent to impose changes to wages, benefits and working conditions, and correspondence with Lamont Satchel, the City Labor Relations Director. Mr. Young will testify about presentations made by the City in June and July 2013 relative to pension restructuring and health plan changes for DPLSA members, and other meetings with the City/Emergency Manager to talk about employment issues

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for DPLSA members, and the City's statement that the meetings should not be categorized as negotiations.

4. Mary Ellen Gurwitz (see Declaration, Dkt. 512-8)  
c/o Erman, Teicher Miller, Zucker & Freedman, P.C  
400 Galleria Officentre, Suite 444  
Southfield, MI 48034  
Telephone: (248) 827-4100

Ms. Gurewitz will testify about the lack of negotiations between the DPCOA and the City and the terms that have been imposed by the City, and, in particular, the lack of negotiations with the City prior to the chapter 9 filing.

B. The Detroit Public Safety Unions' hereby submit this consolidated witness list of individuals who may be called as witnesses in the eligibility trial:

1. Jeffrey M. Pegg, Vice President, DFFA Local 344
2. Teresa Sanderfer, Secretary, DFFA Local 344 Committee Member
3. Robert A. Shinske, Treasurer, DFFA Local 344
4. Linda Broden, Sergeant at Arms, DPOA RDPFFA
5. Rodney Sizemore, Vice President
6. Steve Dolunt, President, DPCOA
7. James Moore, Vice president, DPCOA

Each of the Detroit Public Safety Unions reserves the right to call any witness listed by the City, the State of Michigan or by any objecting party.

C. Witnesses from Deposition testimony:

Each of the Detroit Public Safety Unions reserves the right to offer any portion of any deposition designated by any other objecting party.

## ***II. Exhibit List***

The Detroit Public Safety Unions' hereby submit this consolidated exhibit list of evidence that will or may be used as evidence during the eligibility trial:

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<b>Public Safety Unions' Exhibit No.</b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
1.	DFFA letter dated July 12, 2013	
2.	Jones Day letter of July 17, 2013	
3.	<u>City of Detroit and Detroit Police Officers Association</u> , MERC Case No. D12 D-0354 Panel's Findings, Opinion and Orders	Hearsay; Relevance
4.	<u>City of Detroit and Detroit Police Officers Association</u> , MERC Case No. D12 D-0354, Supplemental Award	Hearsay; Relevance
5.	<u>City of Detroit v. DPOA</u> MERC Case No.D12 D-0354 Chairman's Partial Award on Health Insurance	Hearsay; Relevance
6.	Letter from Jones Day, Brian West Easley, dated June 14, 2013	
7.	Letter from Jones Day, Brian West Easley, dated June 27, 2013	
8.	DFFA Master Agreement, 2001-2009	
9.	DFFA Act 312 Award, dated	Hearsay; Relevance
10.	DFFA Supplemental Act 312 Award, dated	Hearsay; Relevance
11.	DFFA Temporary Agreement	Hearsay; Relevance
12.	DPLSA Master Agreement, 2009	
13.	DPCOA Master Agreement,	
14.	DPCOA Temporary Agreement	Hearsay; Relevance
15.	<u>City of Detroit v. DPOA</u> MERC Case No.D09 F-0703 Decision and Order	Hearsay; Relevance

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Each of the Detroit Public Safety Unions reserves the right to rely on any portion of any Exhibit offered into evidence by the City, the State or any other objecting party.

# ATTACHMENT G

## THE RETIREMENT SYSTEMS' CONSOLIDATED (1) WITNESS LIST, (2) EXHIBIT LIST AND (3) DEPOSITION DESIGNATIONS

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**THE RETIREMENT SYSTEMS' CONSOLIDATED  
(1) WITNESS LIST,  
(2) EXHIBIT LIST AND (3) DEPOSITION DESIGNATIONS**

The Police and Fire Retirement System of the City of Detroit (“PFRS”) and the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”), through their counsel, Clark Hill PLC, hereby submits the following Consolidated (1) Witness List, (2) Exhibit List and (3) Deposition Designations:

***I. Witness List***

A. The Retirement Systems hereby submit this consolidated witness list of individuals who will be called as witnesses via deposition and/or live testimony in the eligibility trial:

1. Kevyn D. Orr, Emergency Manager for the City of Detroit
2. Andrew Dillon, Michigan Treasurer (via deposition or live)
3. Richard Snyder, Michigan Governor (via deposition or live)
4. Kenneth Buckfire, Miller Buckfire (via deposition or live)

B. The Retirement Systems hereby submit this consolidated witness list of individuals who may be called as witnesses in the eligibility trial:

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1. Glenn Bowen, Milliman Principal and Consulting Actuary  
Glenn Bowen (via deposition)
  2. Lamont Satchel, Michigan Labor Relations Director Lamont  
Satchel (via deposition)
  3. Charles Moore, Conway Mackenzie Managing Director (via  
deposition)
  4. Bradley A. Robins, Head of Financing Advisory &  
Restructuring for North America at Greenhill & Co., LLC
  5. Eric Mendelsohn, Managing Director of Greenhill & Co., LLC
  6. David Bing, Mayor for the City of Detroit (via deposition)
  7. Howard Ryan, State of Michigan 30(b)(6) Witness (via  
deposition)
- C. The Retirement Systems hereby reserves the right to call as a

witness any witness identified by any other party, regardless of whether such  
witness is called to testify.

D. The Retirement Systems hereby reserves the right to call as a  
witness any rebuttal and/or impeachment and/or foundation witness as  
necessary.

## ***II. Exhibit List***

The Retirement Systems hereby submits this consolidated exhibit list  
of evidence that will or may be used as evidence during the eligibility trial:

<b>Retirement Systems <u>Exhibit No.</u></b>	<b><u>Exhibit</u></b>	<b><u>Objections</u></b>
1.	OrrDep. Ex. 5, M.C.L.A. Const. Art. 9, § 24	
2.	01/29/13 – Orr Dep. Ex. 21, DTMI00128731–805 (Jones Day 1/29/13 Pitchbook)	
3.	01/30/13 – OrrDep. Ex. 1, JD–RD– 0000113 (email chain)	

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4.	01/31/13 – OrrDep. Ex. 4, JD–RD–0000295–96 (email chain)	
5.	01/31/13 – OrrDep. Ex. 3, JD–RD–0000300–02 (email chain)	
6.	01/31/13 – OrrDep Ex. 2, JD–RD–0000303 (email chain)	
7.	02/13/13 – OrrDep. Ex. 20, JD–RD–0000334–36 (email chain)	
8.	02/15/13 – OrrDep. Ex. 25, JD–RD–0000354–55 (email chain)	Authentication ; Hearsay
9.	02/20/13 – OrrDep Ex. 6, JD–RD–0000216–18 (email chain)	
10.	02/22/13 – OrrDep. Ex. 7, JD–RD–0000459–64 (email chain)	
11.	03/2013 – Orr Dep. Ex. 22, DTMI00129416 (Restructuring Plan)	
12.	05/12/13 – Orr Dep. Ex. 8, (Financial and Operating Plan)	
13.	06/14/13 – Orr Dep. Ex. 9, Dkt. 438–16 (City of Detroit Proposal for Creditors)	
14.	06/27/13 – Orr Dep. Ex. 18, DTMI00082699 (letter Re: City of Detroit Restructuring)	
15.	07/12/13 – Orr Dep. Ex. 12, Dkt. 512–6 (letter Re: City of Detroit Pension Restructuring)	
16.	07/17/13 – Orr Dep. Ex. 13, Dkt. 512–6 (letter Re: City of Detroit Pension Restructuring)	
17.	07/16/13 – Orr Dep. Ex. 10, Dkt. 11–10 (letter Re: Recommendation Pursuant to Section 18(I) of PA 436)	
18.	07/18/13 – Orr Dep. Ex. 11, Dkt. 11–11 (letter Re: Authorization to Commence Chapter 9 Bankruptcy Proceeding)	
19.	09/11/13 – Orr Dep. Ex. 14, (Retiree Legacy Cost Restructuring)	

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	Presentation)	
20.	09/13/13 – Orr Dep. Ex. 17, Dkt. 849 (City of Detroit Objections and Responses to Detroit Retirement Systems' Frist Requests for Admission Directed to the City of Detroit	
21.	11/16/12 – Bowen Dep. Ex. 9, DTMI00066269–74 (letter Re: DGRS Simple Projection)	
22.	05/20/13 – Bowen Dep. Ex. 10 DTMI00066285 (Letter Re: DGRS Simple 10–Year Projection of Plan Freeze and No Future COLA	
23.	05/21/13 – Bowen Dep Ex. 11, (letter from G. Bowen to E. Miller Re: PFRS Simple 10–Year Projection of Plan Freeze and No Future COLA	
24.	09/24/13 – Bowen Dep. Ex. 4, DTMI00066176–90 (letter Re: PFRS Simple 10–Year Projection of Plan Freeze and No Future COLA)	
25.	09/24/13 – Bowen Dep. Ex. 14, (letter Re: One–Year Service Cancellation for DRGS and PFRS)	
26.	06/14/13 – Satchel Dep. Ex. 19, Dkt. 438–7(letter Re: Retiree Benefit Restructuring Meeting)	
27.	06/17/13 – Satchel Dep. Ex. 20, Dkt. 438–6 (letter Re: Request from EFMfor additional information)	
28.	06/21/13 – Satchel Dep. Ex. 18, DTMI00078573 (email attaching 6/20/13 Retiree Legacy Cost Restructuring)	
29.	07/02/13 – Dkt. 438–9 (letter from S. Kreisberg to B. Easterly Re: Request for Information)	
30.	07/03/13 – Dkt. 438–10 (letter from	

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	B. Eastley to S. Kreisberg Re: City of Detroit Restructuring)	
31.	07/08/2013 – Email from Bill Nowling to Governor’s staff regarding timeline (SOM20010097–100, plus unnumbered timeline attachment)	Hearsay
32.	07/17/2013 – Timeline/City of Detroit Chapter 9 Communications Rollout Plan (Snyder Dep 6, SOM20001331, plus unnumbered attachment)	Hearsay
33.	01/29/2013 – Baird Dep. Ex. 1 – Presentation to the City of Detroit, Jones Day (DTMI00128731–805)	
34.	07/09/2013 – Dillon Dep. Ex. 5 – Email A. Dillon to R. Snyder, D. Muchmore, R. Baird re: Detroit (SOM20010234)	Hearsay
35.	04/15/2013 – Email T. Stanton to B. Stibitz re: crains (SOM20009880)	Hearsay
36.	03/13/2013 – Email A. Dillon to T. Saxton, B. Stibitz, F. Headen re: KO (SOM20009255–56)	Hearsay
37.	02/27/2013 – Email J. Martin to C. Ball (cc: A. Dillon, K. Buckfire) re: Solicitation for Restructuring Legal Counsel (DTMI00234545)	Privileged Attorney Work Product
38.	05/12/2013 – Vickie Thomas CBS Detroit report re <i>Detroit EM Releases Financial Plan; City Exceeding Budget By \$100M Annually</i>	Hearsay
39.	05/12/2013 – Financial and Operating Plan, City of Detroit, Office of Emergency Manager, Kevyn D. Orr	
40.	03/25/2012 – Email L. Marcero to K. Buckfire, etc. re: FW: Comments to draft from the City 3/23 (DTMI00234777–78)	Hearsay

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41.	03/29/2012 – L. Marcero to K. Buckfire, et al. re: FW: Revised Agreement (DTMI00234774–76)	Hearsay
42.	05/20/2012 – H. Sawyer to K. Buckfire, et al. re: Detroit Update (DTMI00234763–64)	Hearsay
43.	6/5/2012 K. Herman to K. Buckfire, et al. re: Detroit consent agreement lawsuit to be heard by Ingham County Judge Collette (DTMI00234761–62)	Hearsay
44.	6/5/2012 – T. Wilson to H. Lennox re: meeting with Governor and conversation with K. Buckfire and Memos for Andy Dillon (DTMI00233348–49)	Privileged Attorney Work Product
45.	3/24/2012 Email to Ken Buckfire from L. Marcero (DTMI00234796–798)	Hearsay
46.	3/2/2012 – Email RE: PA 4 and Consent Agreement (Dillon Ex. 6, DTMI0023878–80)	Hearsay
47.	12/5/2012—Email K. Buckfire to C. Ball, et al. (DTMI00234741–48)	Privileged Attorney Work Product
48.	6/27/2013 Email from Tom Saxton and Terry Stanton (SOM20002871)	Hearsay
49.	3/3/2012 Email to Andy Dillon (Dillon Ex. 7, DTMI00234877)	Hearsay
50.	3/7/2012 Email to Ken Buckfire (DTMI00234867–234871)	Privileged Attorney Work Product
51.	3/24/2012 Email RE: Andy Dillon and Ch. 9 (DTMI00234799–800)	Privileged Attorney Work Product
52.	3/24/2012 Email to Ken Buckfire RE: Meeting w/ Dillon RE: PA, PA 72, Ch. 9 filing (DTMI00234796–234798)	Hearsay

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53.	1/28/2013 Email to Orr RE: RFP (DTMI00235165-66)	Hearsay
54.	11/21/2012 Email to Ken Buckfire (Buckfire Dep. Ex. B13, DTMI00103933-34)	Hearsay
55.	1/30/2013 Email to K. Orr RE: RFP by MB (DTMI00234685)	Hearsay
56.	3/22/2013 Treasury Email RE: Milliman report (Dillon Exhibit 8, SOM20009920-9921)	Hearsay
57.	3/5/2012 Email to Andy Dillon (DMTI00231930)	Privileged Attorney Work Product
58.	7/8/2013 Email from Dillon to Governor (Baird Dep Ex. 7, SOM20003601)	Hearsay
59.	3/10/2012 Email to K. Buckfire (DTMI00234852-863)	Privileged Attorney Work Product
60.	1/28/2013 Email to K. Orr RE: Detroit Ch. 9 (DTMI00234687)	Privileged Attorney Work Product
61.	1/30/2013 Email to K. Orr RE: RFP Process (DTMI00234684-86)	Hearsay
62.	3/24/2012 Email to K. Buckfire RE: Update on Meeting with State Today (DTMI00234779-4788)	Privileged Attorney Work Product
63.	3/22/2012 Email to Andy Dillon and K. Buckfire (DTMI00234814)	Hearsay
64.	3/27/2012 Email to Chuck Moore (DTMI00235061)	Hearsay
65.	2/11/2013 Email to K. Orr RE: Ch. 9 filing (DTMI00235163)	Privileged Attorney Work Product
66.	1/15/2013 Email to K. Orr (DTMI00235218)	Privileged Attorney Work Product

### ***III. Deposition Designations***

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**The Retirement Systems hereby submits the following deposition**

**designations:**

09/16/13 Kevyn Orr

p. 10, L. 23 – p. 11, L. 14  
p. 10, L. 17–22  
p. 12, L. 1 – p. 13, L. 25  
p. 14, L. 14 – p. 15, L. 17  
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p. 20, L. 19 – 25  
p. 21, L. 3 – 20  
p. 21, L. 21 – 24  
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p. 23, L. 24 – 25  
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p. 32, L. 14 – 23  
p. 33, L. 5 – 13  
p. 38, L. 11 – p. 41, L. 17  
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p. 85, L. 19 – p. 86, L. 1  
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p. 120, L. 19 – p. 121, L. 12  
p. 122, L. 7 – p. 123, L. 14  
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p. 134, L. 3 – p. 135 L. 4  
p. 136, L. 18 – p. 137, L. 1  
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p. 145, L. 25 – p. 146, L. 10  
p. 147, L. 19 – 25  
p. 148, L. 16 – p. 153, L. 8  
p. 166, L. 12 – 24  
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p. 172, L. 19 – p. 176, L. 20  
p. 177, L. 21 – p. 178, L. 1  
p. 179, L. 2 – p. 185, L. 23  
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 p. 280, L. 17 – 19  
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#### 10/04/13 Kevin Orr Deposition Designations

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## ATTACHMENT H

### OBJECTORS' OBJECTIONS TO THE CITY OF DETROIT DEBTOR'S LIST OF EXHIBITS

Objectors jointly submit the following objections to The City of Detroit, Michigan (the "City's"), list of exhibits:

<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
1.	Charter – City of Detroit [DTMI00230808-0933]	
2.	Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2008 [DTMI00230934-1157]	
3.	Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2009 [DTMI00231158-1378]	
4.	Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2010 [DTMI00230335-0571]	
5.	Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2011 [DTMI00230572-0807]	
6.	Comprehensive Annual Financial Report for the City of Detroit, Michigan for the Fiscal Year Ended June 30, 2012 [DTMI00231379-1623]	

<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
7.	November 13, 2012, Memorandum of Understanding City of Detroit Reform Program [DTMI00222996-3010]	
8.	July 18, 2013 Declaration of Gaurav Malhotra in Support of the Debtor's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code (the "Malhotra Declaration")	Hearsay; Expert opinion
9.	Cash Flow Forecasts [Malhotra Declaration Ex. A]	Hearsay; Expert opinion; Foundation
10.	Ten-Year Projections [Malhotra Declaration Ex. B]	Hearsay; Expert opinion; Foundation
11.	Legacy Expenditures (Assuming No Restructuring) [Malhotra Declaration Ex. C]	Hearsay; Expert opinion; Foundation
12.	Schedule of the sewage disposal system bonds and related state revolving loans as of June 30, 2012 [Malhotra Declaration Ex. D]	
13.	Schedule of water system bonds and related state revolving loans as of June 30, 2012 [Malhotra Declaration Ex. E]	
14.	Annual Debt Service on Revenue Bonds [Malhotra Declaration Ex. F]	
15.	Schedule of COPs and Swap Contracts as of June 30, 2012 [Malhotra Declaration Ex. G]	
16.	Annual Debt Service on COPs and Swap Contracts [Malhotra Declaration	

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
	Ex. H]	
17.	Schedule of UTGO Bonds as of June 30, 2012 [Malhotra Declaration Ex. I]	
18.	Schedule of LTGO Bonds as of June 30, 2012 [Malhotra Declaration Ex. J]	
19.	Annual Debt Service on General Obligation Debt & Other Liabilities [Malhotra Declaration Ex. K]	
20.	July 18, 2013 Declaration of Kevyn D. Orr In Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code (the "Orr Declaration")	Hearsay; Expert opinion; Foundation
21.	January 13, 2012, City of Detroit, Michigan Notice of Preliminary Financial Review Findings and Appointment of a Financial Review Team [Orr Declaration Ex. C]	
22.	March 26, 2012, Report of the Detroit Financial Review Team [Orr Declaration Ex. D]	
23.	April 9, 2012, Financial Stability Agreement [Orr Declaration Ex. E]	
24.	December 14, 2012, Preliminary Review of the City of Detroit [Orr Declaration Ex. F]	
25.	February 19, 2013, Report of the Detroit Financial Review Team [Orr	

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
	Declaration Ex. G]	
26.	March 1, 2013, letter from Governor Richard Snyder to the City [Orr Declaration Ex. H]	
27.	July 8, 2013, Ambac Comments on Detroit [Orr Declaration Ex. I]	Hearsay; Foundation; Relevance
28.	July 16, 2013, Recommendation Pursuant to Section 18(1) of PA 436 [Orr Declaration Ex. J]	
29.	July 18, 2013, Authorization to Commence Chapter 9 Bankruptcy Proceeding [Orr Declaration Ex. K]	
30.	July 18, 2013, Emergency Manager Order No. 13 Filing of a Petition Under Chapter 9 of Title 11 of the United States Code [Orr Declaration Ex. L]	
31.	Declaration of Charles M. Moore in Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code (the "Moore Declaration")	Hearsay; Expert opinion; Foundation
32.	Collection of correspondence between Jones Day and representatives of Unions regarding the representation of current retirees [DTMI00084776-4924]	Hearsay; Authentication; Completeness; Foundation
33.	Chart on verbal communications with Unions regarding the representation of current retirees authored by Samantha Woo	Hearsay; Authentication; Foundation; Legibility; Relevance

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
	[DTMI00231920]	
34.	Memorandum to File about communications with Unions regarding the representation of current retirees authored by Samantha Woo dated October 4, 2013  [DTMI00231927-DTMI00231929]	Hearsay; Authentication; Foundation;
35.	Redacted log of meetings and correspondence between the City and its advisors and various creditors prior to July 18, 2013. [DTMI00231921-1926]	
36.	FRE 1006 chart summarizing efforts to negotiate with union creditors. [DTMI-00235448]	Hearsay; Foundation; Authentication
37.	FRE 1006 chart summarizing efforts to negotiate with other creditors. [DTMI-00235447]	Hearsay; Foundation; Authentication
38.	FRE 1006 chart summarizing the City's projected cash flows. [DTMI00235438]	Hearsay; Foundation; Authentication
39.	February 21, 2013 to June 21, 2013 Calendar of Lamont Satchel [DTMI00125142-5183]	Hearsay; Foundation; Authentication; Relevance
40.	List of Special Conferences for Association held with Members of Police Labor Relations [DTMI00125426]	Hearsay; Foundation; Authentication; Relevance
41.	June 10, 2013, City of Detroit Financial and Operating Plan Slides	Hearsay; Authentication; Foundation; Expert opinion

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
	[DTMI00224211-4231]	
42.	RSVP List for June 14, 2013 Proposal for Creditors Meeting [DTMI00125427]	
43.	June 14, 2013, City of Detroit Proposal for Creditors [DTMI00227144-7277]	
44.	June 14, 2013 Proposal for Creditors – Executive Summary [DTMI00227278-7342]	
45.	List of Invitees to the June 20, 2013 Meetings [DTMI00128659-8661]	
46.	Sign-in sheets from June 20, 2013, 10:00 AM-12:00 PM (Non-Uniform Retiree Benefits Restructuring) [DTMI00235427-5434]	
47.	Sign-in sheets from June 20, 2013 2:00-4:00 PM (Uniform Retiree Benefits Restructuring) [DTMI00235435-5437]	
48.	June 20, 2013 City of Detroit Retiree Legacy Cost Restructuring – Non-Uniform Retirees [DTMI00067906-7928]	Hearsay; Authentication; Foundation; Expert opinion
49.	June 20, 2013 City of Detroit Retiree Legacy Cost Restructuring – Uniform Retirees [DTMI00067930-7953]	
50.	Invitee List and Sign-in Sheet for the June 25, 2013 Meeting [DTMI00125428-5431]	
51.	Cash Flow Forecasts provided at June 25, 2013 Meeting [DTMI00231905-1919]	Hearsay; Expert opinion; Authentication; Foundation
52.	Composite of emails attaching 63 letters dated June 27, 2013 to	

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
	participants of the June 20, 2013 meetings [DTMI00128274-DTMI0012835; DTMI00239435-DTMI0023446]	
53.	List of Attendees at July 9 and 10, 2013 Creditor Meetings [DTMI00231791]	
54.	Detroit Future City Plan 2012 [DTMI00070031-0213]	Hearsay; Expert opinion; Foundation
55.	Collection of correspondence regarding invitations to the July 10 Pension Meetings and July 11 Retiree Health Meetings [DTMI00235408-5426]	
56.	July 10, 2013 City of Detroit Sign In Sheet for 1:00 PM Pension and Retiree Meeting [DTMI00229088-9090]	
57.	July 10, 2012 City of Detroit Sign In Sheet for 3:30 PM Police and Fire Meeting [DTMI00229091-9094]	
58.	July 11, 2013 City of Detroit Sign-in Sheet for 10:00 AM Non-Uniformed Meeting. [DTMI00229095-9096]	
59.	July 11, 2013 City of Detroit Sign-in Sheet for the 1:30 PM Uniformed Meeting. [DTMI229102-9103]	
60.	July 11, 2013 City of Detroit Union-Retiree Meeting Draft Medicare Advantage Plan Design Options [DTMI00135663]	
61.	Correspondence between representatives of AFSCME and representatives of the City [Ex. F to the City of Detroit's Consolidated Reply to Objections to the Entry of an Order for Relief, Docket No. 765]	
62.	Michigan Attorney General Opinion No. 7272	Relevance; Foundation; Hearsay; Legal opinion

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
63.	July 31, 2013 Notice of Filing Amended List of Creditors Holding 20 Largest Unsecured Claims	
64.	September 30, 2013 Notice of Filing of Second Amended List of Creditors and Claims, Pursuant to Sections 924 and 925 of The Bankruptcy Code	
65.	June 4, 2013 Letter from Glenn Bowen and Katherine A. Warren to Evan Miller [DTMI00066292-6307]	Hearsay; Expert opinion; Foundation
66.	June 4, 2013 Letter from Glenn Bowen and Katherine A. Warren to Evan Miller [DTMI00066176-6190]	Hearsay; Expert opinion; Foundation
67.	June 14, 2013 Letter from Glenn Bowen and Katherine A. Warren to Evan Miller [DTMI00066206-6210]	Hearsay; Expert opinion; Foundation
68.	June 30, 2011, Gabriel Roeder Smith & Company, 73 <sup>rd</sup> Annual Actuarial Valuation of the General Retirement System of the City of Detroit [DTMI00225546-5596]	Hearsay; Expert opinion; Foundation
69.	April 2013, Gabriel Roeder Smith & Company, Draft 74 <sup>th</sup> Annual Actuarial Valuation of the General Retirement System of the City of Detroit as of June 30, 2012 [DTMI00225597-5645]	Hearsay; Expert opinion; Foundation
70.	June 30, 2012, Gabriel Roeder Smith & Co., 71 <sup>st</sup> Annual Actuarial Valuation of the Police and Fire Retirement System of the City of Detroit [DTMI	Hearsay; Expert opinion; Foundation

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<b>City's Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
	00202414-2461]	
71.	November 8, 2012 Letter from Kenneth G. Alberts to The Retirement Board Police and Fire Retirement System for the City of Detroit [DTMI00202462-2491]	Hearsay; Expert opinion; Foundation
72.	November 21, 2011 Memorandum from Irvin Corley Jr., to Council Members of the City of Detroit City Council [DTMI00202511-2523]	Hearsay; Expert opinion; Foundation
73.	July 17, 2013 Letter from Evan Miller to representatives of the City of Detroit Police and Firefighters Unions	
74.	July 15, 2013 Quarterly Report with Respect to the Financial Condition of the City of Detroit (period April 1st - June 30th)	
75.	May 12, 2013 City of Detroit, Office of the Emergency Manager, Financial and Operating Plan	

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**ITEM NO. 24**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	-----X	
	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
	-----X	

**DEBTOR’S RESPONSE TO MOTION *IN LIMINE* TO EXCLUDE  
OPINIONS OR CONCLUSIONS AS TO THE CITY OF DETROIT,  
MICHIGAN’S UNDERFUNDING OF PENSION LIABILITY**

The Official Committee of Retirees moves the Court to preclude any testimony by Charles Moore regarding the City’s estimation that its pension funds are underfunded by \$3.5 billion because he has not been qualified as an expert under Fed. R. Evid. 702. Specifically, the Committee argues that any testimony regarding a \$3.5 billion underfunding should not be admitted because such representations are based upon actuarial expertise and “the City ha[s] not completed an actuarial valuation placing the City’s underfunded pension liability at \$3.5 billion.” Motion at ¶ 8.

The Committee misunderstands the scope of Mr. Moore’s testimony. Mr. Moore will not offer any testimony, expert or otherwise, about a \$3.5 billion underfunding. Indeed, he will not offer any financial projections of his own, or



from Milliman (the City's actuarial consultant), regarding the City's unfunded pension liability, but will instead testify about the level of unfunded liability that has been reported by the pension funds themselves. Specifically, his testimony will rely upon his personal knowledge of particular financial records reviewed during his work as a Certified Public Accountant ("CPA"), and will involve straightforward calculations derived from the pensions funds' own actuarial reports (which the Objectors have agreed are admissible). Although Mr. Moore's knowledge as a CPA may have made him more efficient at reviewing the City's pension records, his review and resulting perceptions do not implicate Rule 702.

This Court has broad discretion to rule on evidentiary issues under Rules 701 and 702 of the Federal Rules of Evidence. See JGR, Inc. v. Thomasville Furniture Indus., Inc., 370 F.3d 519, 524 (6th Cir. 2004) (evidentiary rulings reviewed for abuse of discretion); United States v. Bartholomew, 310 F.3d 912, 920 (6th Cir. 2002) (same).

It is well established that lay witnesses may testify based on their own perceptions or "personal observation[s]" of historical facts. Harris v. J.B. Robinson Jewelers, 627 F.3d 235, 241 (6th Cir. 2010). In addition, a non-expert witness may testify "in the form of opinions or inferences" if these "are (a) rationally based on the perception of the witness, (b) helpful to a clear understanding of the witness' testimony or the determination of a fact in issue, and



(c) not based on scientific, technical, or other specialized knowledge within the scope of Rule 702.” Fed. R. Evid. 701. See also Harris, 527 F.3d at 240 (noting that “the modern trend among courts favors the admission of opinion testimony, provided that it is well founded on personal knowledge and susceptible to specific cross-examination”) (citation omitted).

The fact that a witness may have expert credentials does not preclude him from testifying as a non-expert witness. “As the precedent clarifies, the Federal Rules of Evidence distinguish between lay and expert *testimony*, not *witnesses*.” United States v. White, 492 F.3d 380, 403 (6th Cir. 2007) (emphasis in original). As a result, a witness with “expert” credentials “may properly offer lay testimony,” even if he is “precluded from putting forth expert testimony” on the same subject. Id. In such a case, the witness may offer testimony based on “personal knowledge of facts relevant to the case,” based on tasks such as “auditing cost reports” that have been prepared by someone else. Id.

The case of United States v. Madison, 226 Fed. Appx. 535 (6th Cir. 2007) (unpublished), is instructive. In that case, the Government called an FBI “financial analyst” to “facilitate[] [the] review of accounting records,” to prove that a criminal defendant “would not have been able to make [a] down payment . . . without funds converted from [a victim].” Id. at 544. That testimony did not rise to the level of expert testimony because it was based on reports that had already

been prepared by someone else, and the witness's analysis was only "a matter of arithmetic." Id. Quoting approvingly from a similar case in the Eleventh Circuit, the Court noted that "while [the witness's] expertise . . . may have made him more efficient at reviewing [the financial] records, his review itself was within the capacity of any reasonable lay person." Id. at 543-44 (quoting United States v. Hamaker, 455 F.3d 1316, 1331-32 (11th Cir. 2006)).

Here, the testimony of Mr. Moore is of a piece. Far from offering his own complex financial analysis of the City's unfunded pension liability, he will testify only to his own personal observations of the numbers contained in recent reports submitted by Gabriel Roeder, the actuary employed by the pension funds themselves. To the extent Mr. Moore applies any of his own analysis to those reports, he will use basic math to show how the pension funds' own underfunding calculations relate to the City's financial forecasts (which the Objectors also agree are admissible). Contrary to the Committee's contention, he will not engage in any "complicated tasks such as calculating life-expectancy, assessing amortization rates, . . . discounting to present value, or calculating earnings potential in a pension portfolio." Motion at ¶ 6. Nor will he offer testimony about actuarial assumptions, estimated investment returns, or anything else cited by the Committee. See id. ¶ 8.

In addition, Mr. Moore will testify about why the City retained his firm and the tasks he was asked to undertake as its restructuring advisor. Once again, his testimony regarding these issues will be based on his perceptions and personal observations and will not implicate Rule 702. To be sure, Mr. Moore's experience and credentials as a CPA may add to his credibility and provide some reason to give weight to his testimony, but the actual substance of his testimony will not implicate Rule 702.

Dated: October 22, 2013

Respectfully submitted,

/s/ Bruce Bennett

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ATTORNEYS FOR THE CITY OF DETROIT

**ITEM NO. 25**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**STATE OF MICHIGAN’S RESPONSE TO MOTION OF  
INTERNATIONAL UNION, UAW AND FLOWERS PLAINTIFFS  
TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON  
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

The State of Michigan, through its undersigned counsel, submits this Response to Motion of International Union, UAW and Flowers Plaintiffs (collectively, “UAW”) to Compel Production of Documents Withheld on Grounds of Privilege by the State of Michigan (the “Motion to Compel”).

**INTRODUCTION**

The first matter at issue in the UAW’s Motion to Compel is an Email message from Richard Baird, the State’s Transformation Manager, to Kevyn Orr dated March 12, 2013 (the “March 12 Email”). The State produced the March 12 Email, with the portions conveying



legal advice redacted, along with unredacted copies of the attachments to the email, and indicated on its privilege log that March 12 Email was redacted as privileged because it “forward[ed] attorney’s legal advice.” While the State does not agree with the UAW’s asserted challenges and does not waive or alter the Common Interest Agreement or any attorney-client communication privilege, in an effort to resolve this discovery dispute raised on the eve of trial, it is producing the challenged document.

The second issue is whether the Common Interest Agreement between the City and State precludes disclosure of privilege communications between “the Governor, the Governor’s lawyers, Mr. Orr and/or Mr. Orr’s lawyers.” The Court has already determined that it does.

The Common Interest Agreement is between the City, now represented by the Emergency Manager, and the State. Although the formalizing of this Agreement was “on or around the appointment of the Emergency Manager,” the common interests of the City and the State began as early as April 9, 2012 with implementation of the Financial Stability Agreement. These common interests include “the legal and

policy issues that arise as a result of and in relation to the City's financial emergency, the appointment of the Emergency Manager, and the Bankruptcy Case.” (Exhibit B, Common Interest Agreement, p. 3). Thus, the Governor's assertions of attorney-client privilege related to discussions with the Emergency Manager, the City's lawyers, and members of his executive and legal staff, are proper. These communications involved “legal and policy issues” arising “as a result of and in relation to the City's financial emergency” and/or the bankruptcy case. The Governor is entitled to the protection of the attorney-client privilege when acting in his individual executive capacity and is not a “public body” within the meaning of the State's Open Meetings Act, contrary to the UAW's assertion.

As to entries on the State's privilege log that the UAW characterizes as “insufficient,” the State disagrees with this characterization. Yet, the State agreed to the UAW's request on October 18, 2013. (UAW's Motion, Doc. 1294-3, Ex. B, pp. 2-3 of 33.) The State's revised Privilege Logs were e-mailed and mailed to the UAW's counsel. The State does not agree, however, that it has waived



its right to assert privilege based on the nature and character of its initial and/or amended privilege logs.

## **ARGUMENT**

### **I. The State Has Agreed to Produce the Requested March 12, 2013 Email**

In an effort to resolve this dispute and without waiving or amending the Common Interest Agreement, the State is agreeing to produce the March 12, 2013 Email at issue. It is attached as Exhibit A.

### **II. The Governor Properly Invoked Attorney-Client Privilege During His Deposition**

The UAW argues that the City and the State have used the common-interest theory to block inquiry into their joint communications concerning the decision to pursue this chapter 9 filing. *Motion to Compel*, p. 3. This assertion is wholly incorrect and unsupported by any testimony or evidence.

**B. The Governor's assertion of attorney-client privilege in the context of the Common Interest Agreement is consistent with this Court's September 19, 2013 ruling and subsequent order.**

The Governor's assertion of attorney-client privilege in the context of the Common Interest Agreement is consistent with the Court's September 19, 2013 ruling and its subsequent order.

First, the common interest agreement clearly involves more than the bankruptcy filing. In fact, the agreement specifically identifies the common interests as "including but not limited to, those *in connection with* the legal and policy issues that arise as a result of and in relation to the City's Financial Emergency, [and] the appointment of the Emergency Manager." *Common Interest Agreement*, pp. 2-3, emphasis added, attached as Exhibit B. The Governor asserted attorney-client privilege to discussions occurring at the weekly meetings between himself, his executive and legal staff, the Emergency Manager, and the City's attorneys, which he described as discussing the strategies, policies, updates, and other issues related to the City's financial emergency. The State and the City's common interests described in the Agreement are clearly involved in these discussions.

Second, these discussions involved legal strategy and advice. At the September 19 Hearing, the Court analogized the relationship between the City and the State to that of a corporation and its board of directors. The Court reasoned that if the board, its lawyer, the corporation's lawyer and the corporate management all met together, the common interest privilege would shield those communications. While the Court's analogy was in the context of a bankruptcy filing, the Court's reasoning would be equally applicable to a board's appointment of the corporation's CEO, and documents communicating legal advice from the board's lawyer to the CEO just prior, and relating to, the CEO's appointment. Consistent with the Court's September 19, 2013 ruling and subsequent order, attorney-client privilege attached and was properly invoked by the Governor.

Third, while the State appropriately invoked the attorney-client privilege to protect the content of *conversations and discussions* occurring at these meetings, the deposition questions for which the privilege was invoked related to the treatment of pension benefits, and other provisions, of the Emergency Manager's June 2013 proposal to creditors—not to “the decision to pursue the Chapter 9 filing.”

Moreover, the Governor freely testified as to his understanding, views, thoughts, and recollection of facts in response to every topic addressed at the deposition, even when the State could not disclose specific discussions.

Examples of the Governor's testimony in this regard—taken from the deposition transcript excerpts attached by the UAW— are:

Q. Well, between March 28, 2013 and June 14, 2013, did you have discussions with Kevyn Orr about a business plan or a restructuring plan or a redevelopment plan of the City of Detroit?

A. Kevyn Orr was building a plan for creditors they presented in June of this year.

Q. Did you have discussions with him with regard to that plan before the June presentation?

A. I had discussions that would have been subject to attorney-client privilege.

Q. Is it your understanding that that plan includes a two billion dollar note for unsecured creditors?

A. Yes.

Q. And what's your understanding of what that plan includes with regard to vested pension benefits for the citizens of Detroit?

A. The proposal includes some portion of that note being allocated towards pensioners.

*Transcript*, pp. 11-12.

Q. Well, assuming that there is a reduction for the moment in pension benefits, have you had any conversations with Kevyn Orr with regard to whether or not there would be any other benefit or provision made to the retirees of the City of Detroit that were going to lose pension benefits as a result of that plan?

A. Those discussions would have been subject to attorney-client privilege.

Q. What's your understanding of the options that are available to the City of Detroit?

A. Well, again, we're in bankruptcy now so there's been no plan presented by the City at this point in time, so that's a hypothetical.

Q. Do you believe it's fair to have the bankruptcy attorney and other bankruptcy professionals paid ahead of retirees in connection with the Chapter 9 process?

A. I view that as a legal matter because that's a subject matter of how Chapter 9 bankruptcies work.

Q. The question I was asking was whether or not you believe it's fair. I'm not asking you whether or not it's a legal matter.

A. Well, I view it as just speculation on my part because we're in Chapter 9, so that would be part of the legal process.

*Transcript*, pp. 14-15

Q. For that same period of time, during the interview process and up to and including July 18<sup>th</sup> or 19<sup>th</sup>, did you have any conversation with Kevyn Orr with regard to selling or monetizing assets such as the art, Belle Isle and water and sewer and other assets of Detroit?

A. Those discussions would have been subject to attorney-client privilege.

Q. Is it your understanding that the sale of assets are one of the things that are consideration in connection with the restructuring plan that Kevyn Orr proposed during June of 2013?

A. I don't recall that portion of the proposal.

Q. What's your view on monetizing these assets as part of a restructuring plan including the art, Belle Isle and water and sewer and some of the other assets of Detroit?

A. Again, that's a hypothetical discussion because it would really come down to what's presented in the plan of adjustment within the context of the bankruptcy court, and it hasn't been done at this point.

*Transcript*, pp. 43-44

Discussions between the Governor, the Emergency Manager the Emergency Manager's counsel and/or the State's counsel relating to the treatment of pension benefits, whether prior to or after the Chapter 9 filing, are discussions of legal issues that are protected by attorney-client privilege through the common interest agreement. That privilege was properly invoked during the Governor's deposition.

**C. The Governor is not subject to the Open Meetings Act.**

In a footnote, the UAW asserts that the Governor's refusal to answer deposition questions involving his discussions with Mr. Orr is "contrary to the Open Meetings Law. . ." and thus shields the deliberations of public officials from disclosure. *Motion to Compel*, p. 5,

fn 2. The UAW is incorrect. The Governor is not subject to the Open Meetings Act (OMA) where, as here, he is not a “public body” when acting in his individual executive capacity.

Mich. Comp. Laws 15.262(a) defines a public body as:

[A]ny state or local legislative or governing body, including a board, commission, committee, subcommittee, authority, or council, that is empowered by state constitution, statute charter ordinance, resolution, or reule to exercise governmental or proprietary authority or perform a governmental or proprietary function . . . .

Michigan appellate courts have held that an individual executive acting in his executive capacity is not a “public body” for purposes of OMA. See, e.g., *Herald Co. v. Bay City*, 614 N.W.2d 873, 883 (Mich. 2000) (city manager not a public body); *Davis v. City of Detroit Financial Review Team*, 821 N.W.2d 896, 905 (Mich. App. 2012) (When acting in his official capacity with authority derived from the Constitution or by statute, State Treasurer is not a public body). “Public body” denotes a collective entity and “does not encompass individuals.” *Herald Co.*, 614 N.W.2d at 882. Accordingly, the Governor’s refusal to answer deposition questions involving his discussions with Mr. Orr was not contrary to the OMA.

**D. The UAW's Objections to the State's Assertion of Attorney-Client Privilege at the Governor's Deposition is incorrect, untimely, and prejudicial.**

Despite the speedy progression of the bankruptcy proceedings, the UAW has literally waited until the eve of trial to raise this objection. They did not object to the assertion of attorney-client privilege during the deposition, despite the Court's offer to be available during the deposition to resolve any problems that might arise. Nor did they raise a written objection in the nearly two weeks since the deposition. The UAW's delay prejudices the City and the State in terms of overall trial preparation and potentially places additional costs on these parties to produce these documents at trial. The UAW has waived this objection.

**III. While The State Disagrees With The UAW's Characterization, The State Has Revised Its Privilege Logs To Provide the Additional Detail Requested**

The UAW characterizes the State's Privilege Logs as "insufficient." *Motion to Compel*, p. 6. The UAW also claims that the State has waived its right to assert privilege. *Id.*

The State disagrees with the UAW's characterization of the entries on its privilege logs, instead asserting that the logs were sufficient as presented. Again, in an effort to resolve this discovery



dispute raised on the eve of trial, the State agreed to revise its Privilege Logs (attached as Exhibit C.) These revised Privilege Logs have been emailed and mailed to counsel. Despite this agreement, which was given to UAW's counsel on October 18, 2013, the UAW still included this issue in its motion to compel.

The State disagrees that it has waived its right to assert attorney-client privilege. First, the initial log met the minimum requirements for providing sufficient detail to demonstrate that the communications in question were in fact confidential communications relating to legal advice. Contrary to the UAW's assertions, the State did more than offered "conclusory" statements.

The UAW also provides no support for the proposition that a Privilege Log cannot be amended. Indeed, the opposite is true. See, e.g., *Pulte Homes, Inc. v. American Guarantee, and Liability Ins. Co.* No. 09-CV-11616, 2011 WL 8212 (E.D. Mich. January 3, 2011) (noting that the defendant "has already amended this privilege log once.") (Attached as Exhibit D.) As was true in *Pulte Homes, Inc. v. American Guarantee, and Liability Ins. Co.*, No. 09-CV-11616, 2011 WL 8212 (E.D. Mich. January 3, 2011), the State is entitled to amend its

privilege log without the loss of the asserted privilege. Unlike *Pulte*, the State's privilege logs were not bare bones, required only modest modification, if at all, and was not voluntarily at the request of the UAW's counsel.

## CONCLUSION

For the above reasons, the State requests that the Court deny the UAW's Motion to Compel.

Respectfully submitted,

/s/Matthew Schneider

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Michigan Dep't of Attorney  
General

Dated: October 22, 2013

## CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2013, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

/s/Matthew Schneider

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Michigan Department of  
Attorney General

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**EXHIBITS TO:**

**STATE OF MICHIGAN'S RESPONSE TO MOTION OF  
INTERNATIONAL UNION, UAW AND FLOWERS PLAINTIFFS  
TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON  
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

EXHIBIT A - 3/12/2013 EMAIL

EXHIBIT B - Common Interest Agreement

EXHIBIT C - Privilege Logs

EXHIBIT D - Case Opinion - Pulte Homes

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**EXHIBIT A**

**STATE OF MICHIGAN'S RESPONSE TO MOTION OF  
INTERNATIONAL UNION, UAW AND FLOWERS PLAINTIFFS  
TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON  
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

EXHIBIT A - 3/12/2013 EMAIL

---

**From:** Baird, Richard (GOV)  
**Sent:** Tuesday, March 12, 2013 8:54 PM  
**To:** 'Kevyn Orr'  
**Subject:** FW: Draft Contracts--final draft  
**Attachments:** Emergency Financial Manager Contract, 3-14-13.docx; Emergency Manager Contract, 3-28-13.docx

**Importance:** High

Kevyn:

It would be our hope that we could execute these contracts Thursday after the ELB appointment should it be confirmed.

Rich

---

**From:** Headen, Frederick (Treasury)  
**Sent:** Tuesday, March 12, 2013 4:34 PM  
**To:** Gadola, Michael (GOV); Stibitz, Brom (Treasury); Baird, Richard (GOV)  
**Subject:** RE: Draft Contracts  
**Importance:** High

All: Please find attached. Thanks.

---

**From:** Gadola, Michael (GOV)  
**Sent:** Tuesday, March 12, 2013 3:04 PM  
**To:** Stibitz, Brom (Treasury); Headen, Frederick (Treasury); Baird, Richard (GOV)  
**Subject:** RE: Draft Contracts

I'm good.

---

**From:** Stibitz, Brom (Treasury)  
**Sent:** Tuesday, March 12, 2013 2:46 PM  
**To:** Headen, Frederick (Treasury); Gadola, Michael (GOV); Baird, Richard (GOV)  
**Subject:** RE: Draft Contracts

Works for me.

---

**From:** Headen, Frederick (Treasury)  
**Sent:** Tuesday, March 12, 2013 2:32 PM  
**To:** Gadola, Michael (GOV); Stibitz, Brom (Treasury); Baird, Richard (GOV)  
**Subject:** RE: Draft Contracts  
**Importance:** High

See attachments. If okay, I will remove interlineated text and other tracking.

---

**From:** Gadola, Michael (GOV)  
**Sent:** Tuesday, March 12, 2013 2:02 PM  
**To:** Stibitz, Brom (Treasury); Baird, Richard (GOV); Headen, Frederick (Treasury)  
**Subject:** RE: Draft Contracts

Yes. I just wondered if we might save ourselves an issue with the City and some of our "friends" there if we volunteered to pick up the expenses too, but it might be argued that the appropriation in PA 436 doesn't cover expenses. I'm OK with leaving as is but just thought I would raise it.

Mike

---

**From:** Stibitz, Brom (Treasury)  
**Sent:** Tuesday, March 12, 2013 1:57 PM  
**To:** Gadola, Michael (GOV); Baird, Richard (GOV); Headen, Frederick (Treasury)  
**Subject:** RE: Draft Contracts

New law only requires state to cover salary.

---

**From:** Gadola, Michael (GOV)  
**Sent:** Tuesday, March 12, 2013 1:55 PM  
**To:** Stibitz, Brom (Treasury); Baird, Richard (GOV); Headen, Frederick (Treasury)  
**Subject:** RE: Draft Contracts

I agree with Brom's suggestion re internal controls and adding "City or State" to the second contract. Yes, we will be OK with the items Rich mentions with this revision to the contract. Just curious as to why expense reimbursement under the second contract comes from the City when the state is responsible for the salary?? I don't care either way but it raises a question in my mind.

---

**From:** Stibitz, Brom (Treasury)  
**Sent:** Tuesday, March 12, 2013 1:49 PM  
**To:** Baird, Richard (GOV); Headen, Frederick (Treasury); Gadola, Michael (GOV)  
**Subject:** RE: Draft Contracts

But then it would be all set, as long as it isn't from the State or City, right?

---

**From:** Baird, Richard (GOV)  
**Sent:** Tuesday, March 12, 2013 1:48 PM  
**To:** Stibitz, Brom (Treasury); Headen, Frederick (Treasury); Gadola, Michael (GOV)  
**Subject:** RE: Draft Contracts

I agree on the internal controls piece Brom but we will likely flow the special commutation and apartment lease reimbursement through the 501(c) 4. Still happy to have some other set of eyes.

---

**From:** Stibitz, Brom (Treasury)  
**Sent:** Tuesday, March 12, 2013 1:43 PM  
**To:** Headen, Frederick (Treasury); Gadola, Michael (GOV); Baird, Richard (GOV)  
**Subject:** RE: Draft Contracts

Based on the conversations we have had over here at Treasury in the last week or two, let me suggest that the second contract be changed so that Section 3.2 read like this instead (my change in red):

3.2 Salary. The Emergency ~~Financial~~ Manager's salary for services rendered under this Contract shall be \$275,000 per year. If this Contract is terminated after the Emergency ~~Financial~~ Manager has provided services for a portion of a month, the Emergency ~~Financial~~ Manager shall be entitled, for that portion of that month, to \$22,916.67 multiplied by the proportion that the number of days of the month for which services were provided bears to the number of days of the whole month. The Emergency Manager shall not receive or accept any compensation from the City or State except as provided for in this contract.



For Mike and Rich, our conversation focused around how to avoid the next Art Blackwell situation, where a manager is paying themselves out of City funds for things they aren't entitled to.

The other suggestion that I would throw out (again for that worst case scenario) is that we add language to section 3.4 in both contracts (existing language below) that requires a second person in the City to sign off any expense reimbursements going to the manager. It could be the CFO, finance director, or a finance clerk for all I care. I just think a second set of eyes on these things would be good to make sure everything is above board.

3.4 Reimbursement for Actual and Necessary Expenses. The actual and necessary expenses of the Emergency Financial Manager, including customary expenses related to travel, meals, and lodging which are incurred in connection with service to the City will be reimbursed by the City. The Emergency Financial Manager shall provide original copies of all receipts for meals, lodging, and travel reimbursement with any request for reimbursement.

My two cents.

---

**From:** Headen, Frederick (Treasury)  
**Sent:** Tuesday, March 12, 2013 12:29 PM  
**To:** Gadola, Michael (GOV); Baird, Richard (GOV); Stibitz, Brom (Treasury)  
**Subject:** Draft Contracts  
**Importance:** High

Mike:

Per your request, please find the attached draft contracts.

Fred

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**EXHIBIT B**

**STATE OF MICHIGAN'S RESPONSE TO MOTION OF  
INTERNATIONAL UNION, UAW AND FLOWERS PLAINTIFFS  
TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON  
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

EXHIBIT B - Common Interest Agreement

### Common Interest Agreement

This Common Interest Agreement (this "Agreement") is entered into between the following undersigned parties (collectively, the "Parties"): (a) the State of Michigan (the "State"), and (b) the City of Detroit, Michigan (the "City"), by and through its Emergency Manager, Kevyn D. Orr (in his capacity as the Emergency Manager for the City and hereinafter the "Emergency Manager"). This Agreement memorializes and confirms the oral understanding of the Parties with respect to the formation of their Common Interests (as defined below) and extends to any information that the Parties (including their departments and subdivisions, as applicable), their counsel, and their agents already have exchanged or will exchange in connection with their Common Interests, which are discussed below.

WHEREAS, the Governor of the State of Michigan, Richard Snyder (the "Governor") declared the City to be in a financial emergency as early as February 2012 (the "Financial Emergency");

WHEREAS, the City and the State entered into a Financial Stability Agreement, which was certified on April 9, 2012;

WHEREAS, the continuing Financial Emergency resulted in the appointment of the Emergency Manager for the City on March 14, 2013;

WHEREAS, the Parties have been and continue to be engaged in taking steps to evaluate and alleviate the Financial Emergency;

WHEREAS, by letter dated July 16, 2013, the Emergency Manager recommended to the Governor that the City commence a bankruptcy case under chapter 9 of title 11 of the United States Code (the "Bankruptcy Code");

WHEREAS, by letter dated July 18, 2013, the Governor of the State of Michigan authorized the City to commence a chapter 9 case;

WHEREAS, the City commenced a case under chapter 9 of the Bankruptcy Code (Case No. 13-53846) (the "Bankruptcy Case") by filing its petition with the United States Bankruptcy Court for the Eastern District of Michigan on July 18, 2013, after receiving the Governor's written approval;

WHEREAS, the Emergency Manager and officials of the State of Michigan are both defendants in the case of *General Retirement System of the City of Detroit vs. Orr*, Case No. 13-768 filed in Ingham County Circuit Court on July 17, 2013;

WHEREAS, the validity of the appointment and actions of the Emergency Manager and the State of Michigan and its officials have been challenged in a number of other court actions;

WHEREAS, the Parties have reason to expect additional litigation regarding the authority of the Emergency Manager or of the State to have taken and to take actions to address the City's Financial Emergency in the Bankruptcy Case, separate and apart from the State's position as a creditor of the City;

WHEREAS, the City's Financial Emergency continues notwithstanding the filing of the Bankruptcy Case;

WHEREAS, on or around the appointment of the Emergency Manager, the Parties verbally agreed to a common interest agreement and have now concluded that placing the terms of that verbal agreement and newly agreed upon terms in written form is reasonable and appropriate;

WHEREAS, the Parties share certain common interests including, but not limited to, those in connection with the legal and policy issues that arise as a result of and in relation to the City's Financial Emergency, the appointment of the Emergency Manager, and the Bankruptcy

Case (collectively, the "Common Interests");

WHEREAS, the Parties and their counsel wish to pursue their Common Interests, and wish to avoid any suggestion of waiver of confidentiality or immunity of communications and documents protected by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or immunity;

WHEREAS, the Parties and their counsel, in pursuing their Common Interests, may wish to enlist the services of experts, consultants, advisors, or other agents, and intend for such agents to be bound by the restrictions created by this Agreement, as appropriate;

WHEREAS, it is the intention of the Parties that past and future communications among or between them, their counsel, or their agents related to their Common Interests are and shall remain confidential and continue to be protected from disclosure to any third party by applicable privileges and immunities, except as set forth herein;

WHEREAS, to pursue their Common Interests effectively, the Parties and their counsel also have concluded that, from time to time, their Common Interests will be best served by sharing among themselves and their agents documents, factual material, mental impressions, memoranda, data or information analyses, written or oral reports, litigation strategies, and other information, including the confidences of the Parties with counsel (hereinafter "Shared Materials"); and,

WHEREAS, it is the intention of the Parties that no Shared Materials shall be disclosed to any member of the Attorney General's office or other state representative that has taken, is taking, or plans to take a position in the Bankruptcy Case adverse to the position of the City and the Emergency Manager consistent with the Attorney General's internal conflict wall;



IT IS THEREFORE AGREED as follows:

1. Any communications made between or among the Parties, their counsel, and/or their agents with respect to the Common Interests shall be considered confidential and subject to the common interest privilege, as well as any and all other applicable privileges.

2. Except as expressly stated in writing to the contrary, any and all Shared Materials obtained by any of the Parties, their counsel, or their agents are being provided solely for use of the Parties, their counsel, and their agents in connection with the Common Interests and shall remain confidential and shall be protected from disclosure to any third party by the common interest privilege, attorney-client privilege, work product doctrine, and other applicable privileges and immunities, except to the extent waived by a Party asserting the privilege. All Shared Materials shall be used solely in connection with the Common Interests.

3. All persons permitted access to the Shared Materials will be advised that the materials are confidential, privileged, and subject to the terms of this Agreement. In addition, Shared Materials shall be marked to the extent practicable with the following (or similar) header or footer:

**PRIVILEGED AND CONFIDENTIAL  
ATTORNEY WORK PRODUCT  
ATTORNEY-CLIENT COMMUNICATION  
SUBJECT TO COMMON INTEREST AGREEMENT  
NOT SUBJECT TO DISCLOSURE UNDER FOIA**

Failure to include this header/footer will not undermine the protections afforded hereunder.

4. If any person or entity subpoenas, requests under the Michigan Freedom of Information Act, or otherwise demands any Shared Materials from any of the Parties, their counsel, or their agents, such recipient of the subpoena, request, or demand shall immediately

notify all of the Parties' counsel. In addition, the recipient shall take all steps necessary to assert all applicable rights, privileges, and immunities with respect to the Shared Materials to ensure that the Shared Materials remain confidential unless that confidentiality or privilege has been expressly waived in writing by the Party asserting confidentiality or privilege. If a request for Shared Materials is made under the Michigan Freedom of Information Act, the recipient shall raise any and all applicable defenses and/or exemptions under Mich. Comp. Laws § 15.243 available to it or to any other Party to avoid disclosure unless the confidentiality or privilege for the Shared Materials or individual documents or communications that are part of the Shared Materials has been expressly waived in writing by the Party asserting confidentiality or privilege. Waiver of the confidentiality or privilege for an individual document or communication does not waive the confidentiality or privilege of all Shared Materials. The recipient also shall allow the other affected Parties a reasonable opportunity to intervene and be heard, and otherwise cooperate fully with the other affected parties in any administrative or judicial proceeding relating to the disclosure of Shared Materials.

5. The Parties, their counsel, and their agents are not obliged to communicate any independently obtained or created materials with any other Party, counsel, or agent as a result of this Agreement.

6. Nothing in this Agreement shall be deemed to create an attorney-client relationship between any persons, including the attorneys that have signed this Agreement. The fact that any attorney has signed this Agreement shall not in any way preclude that attorney from representing any interest that may be construed to be adverse to any other Party or Party's agent, and shall not be used as a basis for seeking to disqualify any counsel from representing any other

party in this or any other proceeding or matter; and no attorney who has signed this Agreement shall be disqualified from examining or cross-examining any Party or other person who testifies at any proceeding, whether under a grant of immunity or otherwise, because of such attorney's participation in this Agreement.

7. Either Party may withdraw from this Agreement by promptly sending written notice to the other Party, in which case this Agreement shall no longer be operative. The withdrawing Party shall comply with any request to return or destroy any Shared Materials, and shall continue to be bound by the obligations of confidentiality with respect to the Shared Materials previously furnished pursuant to this Agreement.

8. If a Party inadvertently produces any Shared Materials provided by another Party to an entity that is not a Party to this Agreement, in a manner that is not authorized by the terms of this Agreement, such production shall not be deemed a waiver of the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or immunity of any Party hereto. In such circumstances, the producing Party must immediately notify the Party whose Shared Materials are included in such inadvertently produced Shared Materials and must further notify the receiving entity of the inadvertent production and request the return or confirmed destruction of the privileged materials.

9. If a Party inadvertently produces to any or all of the other Parties a privileged document or privileged material that was not intended to be provided under this Agreement, the production of that document or other material shall not be deemed to constitute the waiver of any applicable privileges. In such circumstances, the producing Party must immediately notify the receiving Party of the inadvertent production, and request the return or confirmed destruction of



the privileged materials. Within five days of receiving such notification, the receiving Party shall return or confirm destruction of all such documents or other materials, including any derivative works thereof.

10. This Agreement incorporates all prior oral understandings and it extends to all prior exchanges of Shared Materials. This Agreement is the entire understanding of the Parties with respect to this subject matter and may be modified only by a duly signed writing.

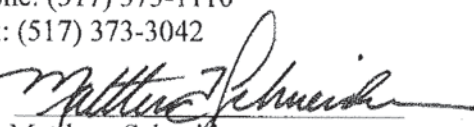
11. This Agreement shall be governed by and construed in accordance with the laws of the State of Michigan.

12. This Agreement may not be amended or modified except by a written agreement signed by each signatory of this Agreement.

13. This Agreement may be executed in any number of counterparts, each counterpart constituting an original, but all together one and the same agreement.

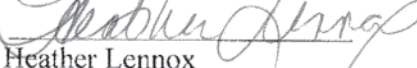
Dated: September 12, 2013

Matthew Schneider  
Chief Legal Counsel  
Michigan Department of Attorney General  
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By:   
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**EXHIBIT C**

**STATE OF MICHIGAN'S RESPONSE TO MOTION OF  
INTERNATIONAL UNION, UAW AND FLOWERS PLAINTIFFS  
TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON  
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

EXHIBIT C - Privilege Logs

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846  
Honorable Steven W. Rhodes

STATE OF MICHIGAN, DEPARTMENT OF ATTORNEY GENERAL  
PRIVILEGE LOG

No.	Date	Author	Recipient	CC	Subject Matter	Privilege	Privilege Log Comment	Production Bates No.
1	12/27/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Roberts, John (GOV) <robertsj9@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000001
2	12/28/2012	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>	Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
3	6/5/2013	Wisniewski, Wendy (GOV) <wisniewskiw@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email containing attorney work product and legal advice from Jones Day regarding creditor poposal, attachment containing same	
4	5/10/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Heather Lennox & Jones Day regarding City of Detroit operations	
5	7/12/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and containing communications regarding materials prepared in anticipation of litigation	
6	7/12/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola	
7	6/6/2013	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
8	6/6/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Isaacs, Carol (AG) <IsaacsC@michigan.gov>; Schneider, Matthew (AG) <SchneiderM7@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email seeking legal advice regarding anticipated litigation	
9	6/24/2013	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Produce-Redact	Reference to legal opinion from Jones Day is redacted	
10	7/18/2013	Snyder, Rick (GOV) <O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SNYDERR11>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>					
11	2/20/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Valerie Brader & Michael Gadola	
12	2/20/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>		EM Legislation	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
13	2/20/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>		EM Legislation	Yes; Attorney Client	Email providing legal advice	
14	12/27/2012	Brader, Valerie (GOV) <braderv@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Ackerman, Darin (GOV) <ackerman3@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Durfee, Sally (GOV) <durfees@michigan.gov>; Keilen, Alison (GOV) <keilena2@michigan.gov>; Murley, David (GOV) <murleyd@michigan.gov>; Rospond, Laurie (GOV) <rospondl@michigan.gov>	Emergency Manager Appointment; EM Legislation	Yes; Attorney Client	Email providing legal advice	
15	12/27/2012	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Ackerman, Darin (GOV) <ackerman3@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Durfee, Sally (GOV) <durfees@michigan.gov>	Keilen, Alison (GOV) <keilena2@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Murley, David (GOV) <murleyd@michigan.gov>; Rospond, Laurie (GOV) <rospondl@michigan.gov>	Emergency Manager Appointment; EM Legislation	Yes; Attorney Client	Email providing legal advice	
16	12/27/2012	Durfee, Sally (GOV) <durfees@michigan.gov>	Brader, Valerie (GOV) <braderv@michigan.gov>; Ackerman, Darin (GOV) <ackerman3@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Keilen, Alison (GOV) <keilena2@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Murley, David (GOV) <murleyd@michigan.gov>	Emergency Manager Appointment; EM Legislation	Yes; Attorney Client	Email providing legal advice	
17	12/27/2012	Brader, Valerie (GOV) <braderv@michigan.gov>	Ackerman, Darin (GOV) <ackerman3@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Durfee, Sally (GOV) <durfees@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Keilen, Alison (GOV) <keilena2@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Murley, David (GOV) <murleyd@michigan.gov>	Emergency Manager Appointment; EM Legislation	Yes; Attorney Client	Email providing legal advice	
18	12/27/2012	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Durfee, Sally (GOV) <durfees@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Ackerman, Darin (GOV) <ackerman3@michigan.gov>; Keilen, Alison (GOV) <keilena2@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Murley, David (GOV) <murleyd@michigan.gov>	Emergency Manager Appointment; EM Legislation	Yes; Attorney Client	Email providing legal advice	
19	7/12/2013	Tedder, Greg (GOV) <O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=TEDDERG>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Roberts, John (GOV) <robertsj9@michigan.gov>; Wisniewski, Wendy (GOV) <wisniewskiw@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
20	7/3/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Orr, Kevyn (Treasury) <OrrK2@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email related to communications with Michael Gadola seeking legal advice and discussing strategy in anticipation of litigation	
21	6/13/2013	Tedder, Greg (GOV) <O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=TEDDERG>	'Doak, James' <james.doak@millerbuckfire.com>		Detroit Pensions		Produced in Production 5	
22	6/10/2013	Tedder, Greg (GOV) <O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=TEDDERG>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day	
23	7/17/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day	
24	7/18/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
25	7/18/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email soliciting and relating to legal advice from Michael Gadola and Valerie Brader	
26	7/3/2013	Murley, David (GOV) <murleyd@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; 'Brian Calley' <lgcalley@gmail.com>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; McBride, Bill (GOV) <mcbrideb@michigan.gov>; Reid, Teresa (GOV) <reidt@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Quebbeman, Marsha (GOV) <quebbemanm@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Rospond, Laurie (GOV) <rospondl@michigan.gov>; Hall, Jean (GOV) <hallj16@michigan.gov>; Chadderdon, Alysha (GOV) <chadderdona@michigan.gov>; VanSickle, Michele (GOV) <vansicklem2@michigan.gov>; Wisniewski, Wendy (GOV) <wisniewskiw@michigan.gov>; Saunders, Kelli (GOV) <saundersk1@michigan.gov>; Durfee, Sally (GOV) <durfees@michigan.gov>; Ackerman, Darin (GOV) <ackerman3@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email from attorney David Murley stating legal advice and mental impressions regarding litigation	
27	4/8/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	

28	4/9/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Brader, Valerie (GOV) <braderv@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Gadola, Michael (GOV) <GadolaM@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
29	5/10/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day, and draft documents prepared by Heather Lennox, Jones Day	
30	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
31	3/12/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
32	7/12/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from Michael Gadola and discussing strategy in anticipation of litigation	
33	7/12/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola and discussing strategy in anticipation of litigation	
34	5/9/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day, and draft documents prepared by Heather Lennox, Jones Day	
35	3/12/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents and edits in connection with provision of legal advice	
36	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
37	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
38	3/12/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
39	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
40	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
41	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
42	3/5/2013	Mason, Keith <kmason@mckennalong.com>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000307
43	2/22/2013	[Name] <[Address]@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000309
44	2/20/2013	Hollins, Harvey (GOV) <hollinsh@michigan.gov>	'John E. Johnson, Jr.' <johnjohnson.esq@gmail.com>	[Name] <[Address]@aol.com>; Wendell Anthony <rewendellanthony@gmail.com>; Heaster Wheeler <hlwheeler@comcast.net>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000313
45	1/7/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola	
46	1/6/2013	Richard McLellan <rdmclellan6633@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>	Richard D. McLellan Esq. Mr. <rdmclellan@comcast.net>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate	
47	1/4/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
48	5/30/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
49	5/30/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRDR>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola	
50	7/12/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Tedder, Greg (GOV) <tedderg@michigan.gov>	Roberts, John (GOV) <roberts9@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from Michael Gadola and discussing strategy in anticipation of litigation	
51	7/12/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email related to communications seeking legal advice and discussing strategy in anticipation of litigation	
52	7/12/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>	Tedder, Greg (GOV) <tedderg@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and containing communications regarding materials prepared in anticipation of litigation	
53	5/10/2013	Roberts, John (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ROBERTS9>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day, and draft documents prepared by Heather Lennox, Jones Day	
54	7/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
55	7/18/2013	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
56	7/18/2013	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Tedder, Greg (GOV) <tedderg@michigan.gov>; Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email soliciting attorney advice	
57	7/5/2013	Bill Nowling <bnowling@dp-company.com>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Bill Nowling <NowlingB@detroitmi.gov>; Shani Penn <PennSh@detroitmi.gov>	Detroit Pensions	Yes; Work Product	Email discussing imminent filing of Syncora lawsuit	
58	6/21/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Bankruptcy	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
59	6/19/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Bankruptcy	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
60	6/18/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email communicating legal advice from counsel	
61	6/7/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email contains attorney advice related to pending litigation and attaching draft pleading	



62	6/6/2013	Roberts, John (GOV) <roberts9@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
63	6/6/2013	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Holyfield, Jeff (GOV) <holyfieldj@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola	
64	7/12/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola and discussing strategy in anticipation of litigation	
65	7/12/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola and discussing strategy in anticipation of litigation	
66	6/22/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>		Detroit Bankruptcy	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
67	6/21/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
68	12/27/2012	Ackerman, Darin (GOV) <ackermamd3@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Durfee, Sally (GOV) <durfees@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Keilen, Alison (GOV) <keilena2@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Murley, David (GOV) <murleyd@michigan.gov>	EM Legislation	Yes; Attorney Client; Produce-Redact	Email providing legal advice	
69	2/20/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		EM Legislation	Yes; Attorney Client	Email providing legal advice	
70	12/27/2012	Murley, David (GOV) <murleyd@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		EM Legislation	Yes; Attorney Client	Email providing legal advice	
71	7/18/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Communication regarding legal advice and litigation	
72	7/17/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Communication regarding legal advice and litigation	
73	7/17/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email and attachment conveying and relating to legal advice from counsel	
74	7/17/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
75	7/12/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Tedder, Greg (GOV) <tedderg@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and discussing strategy in anticipation of litigation	
76	3/26/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
77	3/26/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	'Wilk, W. Alan' <WAWilk@dykema.com>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
78	3/25/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Short, Nancy (GOV) <shortn@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
79	3/12/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email with attorneys regarding attorney draft and legal issues in context of providing legal advice	
80	3/6/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
81	3/6/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
82	3/26/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment; Not Sure	Yes; Attorney Client	Email containing legal advice and edits to draft document	
83	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice; attachment includes attorney edits	
84	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client;	Email providing legal advice; attachment includes attorney edits	
85	3/11/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
86	3/12/2013	Hollins, Harvey (GOV) <hollinsh@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email to counsel for purpose of obtaining legal advice	
87	3/11/2013	Hollins, Harvey (GOV) <hollinsh@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Emails with attorney related to provision of legal advice	
88	7/17/2013	Holyfield, Jeff (GOV) <Holyfieldj@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email attaching for review and comment by counsel draft documents prepared in anticipation of litigation	
89	7/17/2013	Holyfield, Jeff (GOV) <Holyfieldj@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email to counsel seeking legal advice and containing documents prepared in anticipation of litigation	
90	3/7/2013	Lamphier, Wendy (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=LAMPHERW>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Pleyte, Beth (Treasury) <PleyteB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
91	3/25/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
92	3/21/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email between counsel stating legal advice and mental impressions regarding litigation	
93	2/5/2013	Saari, Norm (GOV) <saarin@michigan.gov>	Clement, Elizabeth (GOV) <clemente@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email seeking legal advice	
94	7/17/2013	Schneider, Matthew (AG) <SchneiderM7@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
95	3/25/2013	Short, Nancy (GOV) <shortn@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
96	3/25/2013	Short, Nancy (GOV) <shortn@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
97	3/28/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
98	3/26/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice	
99	3/25/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
100	5/16/2013	wewisniewski@comcast.net	W. Alan Wilk <WAWilk@dykema.com>	'Terri Reid' (terri@reidfinance.com); Gadola, Michael (GOV) <Gadolam@michigan.gov>; wewisniewski@comcast.net	Emergency Manager Appointment; Detroit Bankruptcy		Produced in Production 5	
101	3/28/2013	Wilk, W. Alan <WAWilk@dykema.com>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	'Terri Reid' (terri@reidfinance.com); wewisniewski@comcast.net	Emergency Manager Appointment		Produced in Production 5	
102	1/7/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate	
103	1/7/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate	
104	7/18/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Communication regarding legal advice and litigation	
105	7/17/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	

106	7/17/2013	Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>	Brader, Valerie (GOV) <braderv@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from counsel	
107	7/17/2013	Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email seeking legal advice and sending documents for review by counsel	
108	7/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>	Brader, Valerie (GOV) <braderv@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email containing attorney directions and edits to draft document	
109	7/16/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Brader, Valerie (GOV) <braderv@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email containing attorney draft	
110	6/7/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Schneider, Matthew (AG) <SchneiderM7@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email seeking legal advice regarding anticipated litigation	
111	5/30/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Pete Ellsworth (pellsworth@dickinsonwright.com) (pellsworth@dickinsonwright.com); Brya, Michelle (AG) <BryaM@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
112	5/29/2013	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email seeking legal advice	
113	7/16/2013	Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email circulating documents for review and comment by counsel	
114	7/16/2013	Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
115	7/16/2013	Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
116	7/16/2013	Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Communication attaching attorney's edits to draft legal document	
117	7/16/2013	Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Brader, Valerie (GOV) <braderv@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email and attachments communicating advice of counsel in anticipation of litigation	
118	7/2/2013	Schneider, Matthew (AG) <SchneiderM7@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email seeking legal advice regarding anticipated litigation	
119	6/7/2013	Schneider, Matthew (AG) <SchneiderM7@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email seeking legal advice regarding anticipated litigation	
120	7/18/2013	Rospond, Laurie (GOV) <rospondl@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email requesting legal advice from counsel	
121	5/10/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day, and draft documents prepared by Heather Lennox, Jones Day	
122	5/9/2013	Heather Lennox <hlennox@jonesday.com>	orrk@detroitmi.gov; NowlingB@detroitmi.gov	David G. Heiman <dghelman@jonesday.com>; Jeffrey B Elman <jbellman@jonesday.com>; Corinne Ball <cball@jonesday.com>; Bruce Bennett <bbennett@jonesday.com>	Detroit Pensions	Yes; Attorney Client	Email relating to attorney-client communication from Heather Lennox, Jones Day, and draft documents prepared by Heather Lennox, Jones Day	
123	5/10/2013	Bill Nowling <NowlingB@detroitmi.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Detroit Pensions		Produced in Production 5	
124	5/12/2013	Bill Nowling <nowlingb@detroitmi.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Bill Nowling <NowlingB@detroitmi.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Detroit Pensions		Produced in Production 5	
125	5/12/2013	Bill Nowling <nowlingb@detroitmi.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Bill Nowling <NowlingB@detroitmi.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Detroit Pensions		Produced in Production 5	
126	5/12/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Detroit Pensions		Produced in Production 5	
127	1/6/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Richard McLellan <rdmclellan6633@gmail.com>; Snyder, Rick (GOV) <snvderr11@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
128	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Richard McLellan <rdmclellan6633@gmail.com>; Snyder, Rick (GOV) <snvderr11@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
129	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	SOM40000327
130	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
131	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
132	1/6/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	SOM40000331
133	1/7/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
134	1/7/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
135	1/7/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from attorney Richard McLellan and discussing document drafted by Richard McLellan; contains information regarding emergency manager candidate	
136	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
137	3/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
138	3/12/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
139	3/25/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Short, Nancy (GOV) <shortn@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
140	3/25/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Short, Nancy (GOV) <shortn@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
141	3/25/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
142	3/26/2013	Wilk, W. Alan <WAWilk@dykema.com>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
143	3/26/2013	Wilk, W. Alan <WAWilk@dykema.com>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
144	3/28/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>				
145	3/28/2013	Wilk, W. Alan <WAWilk@dykema.com>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
146	7/17/2013	Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
147	3/14/2013	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emmitt, Beth (GOV) <emmittb@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Silfven, Ken (GOV) <silfvenk@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>; Smith, Jennifer (GOV) <smithj37@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents and comments in connection with provision of legal advice	
148	12/27/2012	Posthumus, Dick (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=POSTHUMUSD>	Ackerman, Darin (GOV) <ackermard3@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Durfee, Sally (GOV) <durfees@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Keilen, Alison (GOV) <keilena2@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Murley, David (GOV) <smurlevd@michigan.gov>	EM Legislation	Yes; Attorney Client	Email providing legal advice	
149	12/28/2012	Emmitt, Beth (GOV) <emmittb@michigan.gov>	Roberts, John (GOV) <roberts9@michigan.gov>		EM Legislation; Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000337
150	12/11/2012	Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		EM Legislation	Yes; Attorney Client	Email seeking legal advice	
151	2/9/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Chuck Moore <cmoore@conwaymackenzie.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>				
152	2/9/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Chuck Moore <cmoore@conwaymackenzie.com>	Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email seeking legal advice	
					Emergency Manager Appointment	Yes; Attorney Client	Email seeking legal advice and providing direction to counsel in preparation of draft documents related to provision of legal advice	

153	2/10/2013	Frederick Headen <headenf@comcast.net>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment; Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
154	6/4/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Jason, Molly (AG) <JasonM@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email requesting legal advice	
155	6/4/2013	Jason, Molly (AG) <JasonM@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email requesting legal advice	
156	5/10/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and attaching draft documents prepared in anticipated litigation	
157	12/1/2012	Liedel, Steven <SLiedel@dykema.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Emergency Manager Appointment; Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
158	2/14/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment; Detroit Pensions	Yes; Attorney Client	Email attaching documents for review and comment by counsel	
159	3/15/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Spillane Jr., Thomas B. (TSpillane@foley.com)	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
160	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email seeking legal advice	
161	3/11/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email soliciting attorney advice	
162	12/23/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; brom stibitz <stibitz@gmail.com>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Charles M. Moore <cmoore@conwaymackenzie.com>; Ken Whipple <kwhipple@hotmail.com>; Sandra E. Pierce <spierce@rbscitizens.com>; Baird, Richard (GOV) <bairdr@michigan.gov>		Detroit Pensions	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
163	1/3/2013	Kriss Andrews <AndrewsK@detroitmi.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Jack Martin <MartinJack@detroitmi.gov>; Gaurav Malhotra <Gaurav.Malhotra@ey.com>; Darrell Burks <DBurks12@gmail.com>; Ken Whipple <kwhipple@hotmail.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Work Product	Email with analysis prepared in anticipation of litigation	
164	7/8/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
165	7/9/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email regarding provision of legal advice by counsel	
166	7/9/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Jones Day	
167	6/14/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
168	5/24/2013	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Koryzno, Edward (Treasury) <KoryznoE@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email communicating legal advice of counsel	
169	5/10/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from counsel and discussing draft document	
170	7/18/2013	Massaron, David P. <Massaron@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Danhof, William J. <Danhof@MillerCanfield.com>		Detroit Bankruptcy	Yes; Attorney Client;	Email related to communications seeking legal advice	
171	7/9/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email providing legal advice	
172	7/9/2013	Morton, Bradley (AG) <MortonB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email regarding pending litigation initiated against Governor and Emergency Manager	
173	6/19/2013	Workman, Wayne <WWorkman@rwbaird.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Produce-Redact	Email soliciting advice from Fred Headen	SOM40000342
174	6/14/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Fred Headen	
175	6/14/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Fred Headen	
176	6/12/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email circulating documents for review and comment originating with Heather Lennox at Jones Day	
177	5/29/2013	Buckfire, Ken <ken.buckfire@millerbuckfire.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Heather Lennonx, Jones Day	
178	5/9/2013	Workman, Wayne <WWorkman@rwbaird.com>	Fielek, Joseph L. (Treasury) <FIELEK@michigan.gov>; Massaron, David P. <Massaron@MillerCanfield.com>	McGuire, Benjamin (Treasury) <McGuireB2@michigan.gov>; Danhof, William J. <Danhof@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Eubanks, Rachael <REubanks@rwbaird.com>; Dembowski, Christopher J. <Dembowski@MillerCanfield.com>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
179	4/5/2013	McGee, Michael P. <McGee@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
180	2/10/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen regarding edits to attorney draft document and attaching draft document	
181	2/10/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen regarding edits to attorney draft document	
182	2/10/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen regarding edits to attorney draft document	
183	6/26/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email providing legal advice and attaching draft documents revised by Miller Canfield and Jones Day attorneys in connection with provision of legal advice	
184	7/16/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	TSpillane@foley.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Sandra E. Pierce <sandy.pierce@firstmerit.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; PPhillips@foley.com; Liedel, Steven <SLiedel@dykema.com>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Koryzno, Edward (Treasury) <KoryznoE@michigan.gov>; Dempkowski, Angela (Treasury) <DempkowskiA@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Barrett, Thomas (Treasury) <BarrettT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email related to communications seeking legal advice and attaching attorney drafts and comments	
185	2/4/2013	Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email relaying advice from attorney Michael P. McGee at Miller Canfield	
186	12/11/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		EM Legislation	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
187	12/11/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		EM Legislation	Yes; Attorney Client	Email providing legal advice	
188	6/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Spillane Jr., Thomas B. (TSpillane@foley.com); Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Orr, Kevyn (Treasury) <OrrK2@michigan.gov>; Tedder, Greg (GOV) <tdderg@michigan.gov>; PennSh@detroitmi.gov; Liedel, Steven <SLiedel@dykema.com>; Sandy E. Pierce <Sandy.Pierce@firstmerit.com>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	



189	6/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client	Email containing legal advice and edits to draft document from Steven Liedel and copying Frank Monticello	
190	3/12/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking legal advice, attorney drafts	
191	3/12/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
192	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email seeking legal advice	
193	1/14/2013	Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email seeking legal advice and sending documents for review by counsel related to provision of legal advice	
194	1/8/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product; Executive Privilege	Email providing legal advice	
195	1/4/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
196	1/4/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Kriss Andrews <AndrewsK@detroitmi.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Jack Martin <MartinJack@detroitmi.gov>; Gaurav Malhotra <Gaurav.Malhotra@ey.com>; Darrell Burks <DBurks12@gmail.com>; Ken Whipple <kwhipple@hotmail.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email seeking legal advice	
197	1/2/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
198	12/28/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	headenf@comcast.net					
199	4/9/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Brader, Valerie (GOV) <braderv@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Gadola, Michael (GOV) <GadolaM@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email and attachment conveying and relating to legal advice from counsel	
200	4/8/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>	Emergency Manager Appointment; Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
201	3/15/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
202	3/28/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
203	3/27/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
204	3/27/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
205	3/26/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
206	3/26/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
207	3/25/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
208	3/25/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
209	3/25/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
210	3/18/2013	Arwood, Cheri (GOV) <ArwoodC@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
211	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
212	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
213	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
214	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
215	3/18/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
216	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
217	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
218	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	



219	3/18/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <robartsj@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
220	3/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <robartsj@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
221	3/13/2013	Saari, Norm (GOV) <saarin@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
222	3/13/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saari, Norm (GOV) <saarin@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email cntaining request for legal advice from counsel	
223	3/7/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
224	3/7/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Elworth, George (AG) <elworthg@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
225	3/7/2013	Nichols, Susan R. (Treasury) <NicholsS4@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking legal advice	
226	3/6/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
227	3/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
228	3/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
229	3/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email regarding directions to and opinions of counsel	
230	3/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing direction to attorney and attorney edits to draft document	
231	3/6/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing direction to attorney and attorney edits to draft document	
232	3/4/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
233	3/4/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting and communicating advice of counsel	
234	3/1/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Nichols, Susan R. (Treasury) <NicholsS4@michigan.gov>	Darling, Richard J. (Treasury) <DarlingR@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting and communicating advice of counsel	
235	3/1/2013	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Nichols, Susan R. (Treasury) <NicholsS4@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Darling, Richard J. (Treasury) <DarlingR@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting and communicating advice of counsel	
236	3/1/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting and communicating advice of counsel	
237	6/5/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Hichez, Amy (Treasury) <Hicheza@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client; Work Product	Email conveying and relating to draft documents prepared by Heather Lennox, Jones Day	
238	12/5/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Spillane Jr., Thomas B. (TSpillane@foley.com)	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email relaying financial information related to obtaining legal advice	
239	6/12/2013	Juan.Santambrogio@ey.com	Kevyn Orr <orrk@detroitmi.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	'Bruce Bennett' <bennett@jonesday.com>; cgannon@conwaymackenzie.com; cmoores@conwaymackenzie.com; Daniel.Jerney@ey.com; David G.Heiman <dgheiman@JonesDay.com>; Gaurav.Malhotra@ey.com; Glenn M.Kushiner <gkushiner@conwaymackenzie.com>; Heather Lennox <hlennox@JonesDay.com>; james.doak@millerbuckfire.com; ken.buckfire@millerbuckfire.com; khand@conwaymackenzie.com; kyle.herman@millerbuckfire.com; Sonya S.Mays <mays@detroitmi.gov>; Tedder, Greg (GOV) <tdderg@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Shani Penn <PennSh@detroitmi.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email circulating documents for review and comment by Jones Day	
240	5/31/2013	Brader, Valerie (GOV) <braderv@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email with counsel seeking legal advice and mental impressions	
241	5/14/2013	Doak, James <james.doak@millerbuckfire.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Buckfire, Ken <ken.buckfire@millerbuckfire.com>	Lennox Heather <hlennox@jonesday.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email relating to communications seeking legal advice from Jones Day regarding anticipated litigation	
242	5/12/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Buhs, Caleb (DIFS) <BuhsC@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email discussion draft document prepared by Heather Lennox, Jones Day	
243	5/9/2013	George P. Butler III <Gbutler@dickinson-wright.com>	DB W <dbw1375@gmail.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Dickinson Wright attorney George Butler	
244	3/20/2013	Cousineau, Sara (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=COUSINEAU>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
245	3/20/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
246	6/5/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Hichez, Amy (Treasury) <Hicheza@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email conveying and relating to draft documents prepared by Heather Lennox, Jones Day	
247	6/26/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Lamont Satchel <Satchel@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email seeking legal advice from Fred Headen and related discussion	
248	1/4/2013	Kriss Andrews <AndrewsK@detroitmi.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>	TSpillane@foley.com; PPhillips@foley.com	Detroit Pensions	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
249	12/7/2012	TSpillane@foley.com	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	SOM30000710
250	3/27/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Scott, Allison (GOV) <scottal12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	
251	3/27/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Scott, Allison (GOV) <scottal12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	
252	3/27/2013	Tedder, Greg (GOV) <tdderg@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Scott, Allison (GOV) <scottal12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	
253	3/27/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Scott, Allison (GOV) <scottal12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	
254	4/18/2013	Cousineau, Sara (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=COUSINEAU> - on behalf of - Stibitz, Brom (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=STIBITZB>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
255	6/10/2013	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email seeking legal advice	

256	3/13/2013	Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>				
					Detroit Pensions	Yes; Attorney Client	Email related to counsel's provision of legal advice and attaching draft documents for review by counsel in connection with provision of legal advice	
257	3/13/2013	Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>				
					Emergency Manager Appointment	Yes; Attorney Client	Email related to counsel's provision of legal advice and attaching draft documents for review by counsel in connection with provision of legal advice	
258	3/20/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>				
					Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications with Michael Gadola and Frederick Headen seeking legal advice regarding draft document	
259	2/13/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>; Koryzno, Edward (Treasury) <KoryznoE@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Barton, John (Treasury) <BartonJ@michigan.gov>					
					Detroit Pensions	Yes; Attorney Client	Email to counsel seeking legal advice	
260	2/4/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
261	3/20/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
262	3/20/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
263	4/3/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking legal advice and discussing attorney draft	
264	4/14/2013	John Clark <jclark@gmhlaw.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Green, Saul A. <greens@millercanfield.com>; Sachs, Kenneth J. <Sachs@MillerCanfield.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Willems, John H. <willems@millercanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Hathaway, Irene Bruce <HathawayI@MillerCanfield.com>; Evan Miller <emiller@JonesDay.com>; Sarah Griffin <sgriffin@JonesDay.com>				
					Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
265	4/15/2013	Sarah Griffin <sgriffin@JonesDay.com>	Sachs, Kenneth J. <Sachs@MillerCanfield.com>	Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Evan Miller <emiller@JonesDay.com>; Green, Saul A. <greens@millercanfield.com>; Hathaway, Irene Bruce <HathawayI@MillerCanfield.com>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; John Clark <jclark@gmhlaw.com>; Willems, John H. <willems@millercanfield.com>				
					Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
266	4/15/2013	Evan Miller <emiller@JonesDay.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Warren, Richard W. <warren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
267	4/16/2013	Evan Miller <emiller@JonesDay.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Warren, Richard W. <warren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
268	4/16/2013	Evan Miller <emiller@JonesDay.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Warren, Richard W. <warren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
269	5/10/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
270	3/28/2013	Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing communications with Michael Gadola and Frederick Headen seeking legal advice regarding draft document	
271	3/27/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney edits to draft documents in connection with provision of legal advice	
272	3/26/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Brya, Michelle (AG) <BryaM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Nelson, Margaret (AG) <nelsonm9@michigan.gov>				
					Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing legal advice and strategy suggestions for pending litigation (Citizens Against Corrupt Government v. Local Emergency Financial Assistance Loan Board)	
273	3/26/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
274	3/25/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
275	3/27/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>; Baird, Richard (GOV) <chairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	
276	3/27/2013	Tedder, Greg (GOV) <tdderg@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>; Baird, Richard (GOV) <chairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email containing communications seeking and providing legal advice	
277	3/27/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>; Baird, Richard (GOV) <chairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
278	3/27/2013	Tedder, Greg (GOV) <tdderg@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>; Baird, Richard (GOV) <chairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
279	3/27/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Tedder, Greg (GOV) <tdderg@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>; Baird, Richard (GOV) <chairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email conveying and relating to legal advice from counsel	SOM30000765
280	3/27/2013	Tedder, Greg (GOV) <tdderg@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>; Baird, Richard (GOV) <chairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email conveying and relating to legal advice from counsel	SOM30000766
281	3/26/2013	Tedder, Greg (GOV) <tdderg@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Eunice Hays <HavesE@detroitmi.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
282	3/13/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>	Emergency Manager Appointment	Yes; Work Product; Produce-Redact	Email containing communications regarding anticipated litigation	
283	3/13/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>	Emergency Manager Appointment	Yes; Work Product; Produce-Redact	Email containing communications regarding anticipated litigation	
284	4/9/2013	Brya, Michelle (AG) <BryaM@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Murphy, Michael (AG) <MurphyM2@michigan.gov>; Nelson, Margaret (AG) <nelsonm9@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing legal advice	
285	3/11/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact; Executive Privilege	Email requesting legal advice of counsel	SOM40000518
286	6/3/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email attaching and discussing draft document prepared by attorney regarding pending litigation (Davis v. Local Emergency Financial Assistance Loan Board)	
287	5/16/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Brya, Michelle (AG) <BryaM@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing legal advice	
288	6/19/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	"Workman, Wayne" <WWorkman@rwbaird.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email soliciting legal advice from Fred Headen and discussion regarding same	

289	6/7/2013	Kevyn Orr <OrrK@detroitmi.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Pensions	Yes; Work Product	Email containing memoranda attachments prepared at request of counsel; discussion of Chapter 9 filing	
290	5/10/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
291	3/21/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email seeking advice of counsel	
292	3/19/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email soliciting attorney advice	
293	3/13/2013	Murphy, Michael (AG) <MurphyM2@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
294	2/10/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to draft document prepared by Fred Headen	
295	12/18/2012	Braeutigam, Jon (Treasury) <JBrauti@invest.treas.state.mi.us>	Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		EM Legislation; Pension	Yes; Attorney Client	Email seeking legal advice regarding proposed legislation	
296	4/12/2013	Green, Saul A. <greens@millercanfield.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	John Clark <jclark@gmhlaw.com>	Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
297	4/14/2013	Green, Saul A. <greens@millercanfield.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	John Clark <jclark@gmhlaw.com>; Sachs, Kenneth J. <Sachs@MillerCanfield.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Willems, John H. <willems@millercanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Hathaway, Irene Bruce <HathawayI@MillerCanfield.com>; 'Evan Miller' <emiller@JonesDay.com>; 'Sarah Griffin' <sgriffin@JonesDay.com>	Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
298	4/14/2013	Green, Saul A. <greens@millercanfield.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
299	4/15/2013	Sachs, Kenneth J. <Sachs@MillerCanfield.com>	Green, Saul A. <greens@millercanfield.com>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	John Clark <jclark@gmhlaw.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Willems, John H. <willems@millercanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Hathaway, Irene Bruce <HathawayI@MillerCanfield.com>; 'Evan Miller' <emiller@JonesDay.com>; 'Sarah Griffin' <sgriffin@JonesDay.com>	Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
300	4/15/2013	John Clark <jclark@gmhlaw.com>	Green, Saul A. <greens@millercanfield.com>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Sachs, Kenneth J. <Sachs@MillerCanfield.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Willems, John H. <willems@millercanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Hathaway, Irene Bruce <HathawayI@MillerCanfield.com>; 'Evan Miller' <emiller@JonesDay.com>; 'Sarah Griffin' <sgriffin@JonesDay.com>	Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
301	12/23/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Kriss Andrews <andrewsk@detroitmi.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
302	12/23/2012	Kriss Andrews <andrewsk@detroitmi.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Kriss Andrews <AndrewsK@detroitmi.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
303	12/23/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Kriss Andrews <andrewsk@detroitmi.gov>	Kriss Andrews <AndrewsK@detroitmi.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
304	12/25/2012	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
305	12/25/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
306	7/11/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email seeking legal advice and providing direction to counsel in preparation of draft documents related to provision of legal advice	
307	7/9/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
308	7/3/2013	Orr, Kevyn (Treasury) <OrrK2@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Buckfire, Ken <ken.buckfire@millerbuckfire.com>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Work Product	Email discussing legal strategy in anticipation of Detroit bankruptcy	
309	6/13/2013	Sonya Mays <MaysS@detroitmi.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Kevyn Orr <OrrK@detroitmi.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to comments from Heather Lennox and other Jones Day attorneys regarding draft documents	
310	6/8/2013	Kevyn Orr <orrk@detroitmi.gov>	ken.buckfire@millerbuckfire.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email seeking legal advice from Miller Canfield and Jones Day attorneys and related discussion	
311	6/8/2013	Buckfire, Ken <ken.buckfire@millerbuckfire.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	'orrk@detroitmi.gov'	Detroit Bankruptcy	Yes; Attorney Client	Email seeking legal advice from Miller Canfield and Jones Day attorneys and related discussion	
312	6/7/2013	Jeffrey B Ellman <jbellman@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; orrk@detroitmi.gov; PennSh@detroitmi.gov; mayss@detroitmi.gov; NowlingB@detroitmi.go	Charles M.Moore <cmoore@conwaymackenzie.com>; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman <dgheiman@JonesDay.com>; Corinne Ball <cball@JonesDay.com>; Heather Lennox <hlennox@JonesDay.com>; Bruce Bennett <bbennett@Jonesday.com>	Detroit Pensions	Yes; Attorney Client	Email conveys and relates to legal advice from counsel	
313	6/5/2013	Thomas A Wilson <tawilson@JonesDay.com>	orrk@detroit.mi.gov; Buckfire, Ken <ken.buckfire@millerbuckfire.com>; Bruce Bennett <bennett@jonesday.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Bruce Bennett <bbnntt@live.com>	Detroit Pensions	Yes; Attorney Client; Work Product	Email containing attorney work product and legal advice, attachment containing same	
314	6/5/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gaurav.Malhotra@ey.com; Kenneth Buckfire (ken.buckfire@millerbuckfire.com); Lennox Heather (hlennox@jonesday.com); james.doak@millerbuckfire.com; Daniel.Lernewicz@ev.com	Pleyte, Beth (Treasury) <PleyteB@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email providing financial analyses and reports prepared at direction of counsel in connection with communications seeking legal advice from Jones Day and Miller Canfield	
315	12/7/2012	TSpillane@foley.com	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>; Sandra E Pierce <SPIERCE@rbscitizens.com>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
316	12/7/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	TSpillane@foley.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>; PPhillips@foley.com; TSpillane@folev.com	Detroit Pensions	Yes; Attorney Client	Email related to attorney's legal advice	
317	12/18/2012	Braeutigam, Jon (Treasury) <JBrauti@invest.treas.state.mi.us>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		EM Legislation; Pension	Yes; Attorney Client	Email seeking legal advice regarding proposed legislation	



318	7/8/2013	Hichez, Amy (Treasury) <HichezA@michigan.gov>	Evan Miller <emiller@JonesDay.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Brackenbury, Robert (Treasury) <BrackenburyR@michigan.gov>; Charles M. Moore (cmoore@conwaymackenzie.com); Braeutigam, Jon (Treasury) <JBraeuti@invest.treas.state.mi.us>; McPhee, Marjorie (Treasury) <McPheeM@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; VanSickle, Michele (GOV) <vansicklem2@michigan.gov>; 'Heather Lennox' (hlennox@JonesDay.com); David G. Heiman <dgheiman@JonesDay.com>; Pleyte, Beth (Treasury)				
319	7/8/2013	Evan Miller <emiller@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Brackenbury, Robert (Treasury) <BrackenburyR@michigan.gov>; Charles M. Moore (cmoore@conwaymackenzie.com); Hichez, Amy (Treasury) <HichezA@michigan.gov>; Braeutigam, Jon (Treasury) <JBraeuti@invest.treas.state.mi.us>; McPhee, Marjorie (Treasury) <McPheeM@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; VanSickle, Michele (GOV)	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
320	7/2/2013	Massaron, David P. <Massaron@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Workman, Wayne <WWWorkman@rwbaird.com>	Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
321	6/26/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Brya, Michelle (AG) <BryaM@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Nixon, John (DTMB) <NixonJ@michigan.gov>; Arwood, Steve (LARA) <ArwoodS@michigan.gov>; Kevyn Orr (OrrK@detroitmi.gov); Tedder, Greg (GOV) <tedderg@michigan.gov>	Booth, Joshua O. (AG) <BoothJ2@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from counsel and discussing draft document	
322	6/20/2013	Brown, Melanie (LARA) <BrownM45@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Brya, Michelle (AG) <BryaM@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Leeds, Lauren (DTMB) <LeedsL@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>; Jackson, Jennifer (AG) <JacksonJF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email attaching and discussing draft document prepared by attorney regarding pending litigation (Davis v. Local Emergency Financial Assistance Loan Board)	
323	6/20/2013	Leeds, Lauren (DTMB) <LeedsL@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Brya, Michelle (AG) <BryaM@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>; Brown, Melanie (LARA) <BrownM45@michigan.gov>; Jackson, Jennifer (AG) <JacksonJF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting advice of counsel	
324	6/20/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Brya, Michelle (AG) <BryaM@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Leeds, Lauren (DTMB) <LeedsL@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>; Brown, Melanie (LARA) <BrownM45@michigan.gov>; Jackson, Jennifer (AG) <JacksonJF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting advice of counsel	
325	6/20/2013	Brya, Michelle (AG) <BryaM@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Leeds, Lauren (DTMB) <LeedsL@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>; Brown, Melanie (LARA) <BrownM45@michigan.gov>; Jackson, Jennifer (AG) <JacksonJF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting advice of counsel	
326	6/20/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Brya, Michelle (AG) <BryaM@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Leeds, Lauren (DTMB) <LeedsL@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email seeking attorney advice	
327	7/15/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email conveys and relates to legal advice from Jeffrey Ellman, Jones Day	
328	6/28/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>			Detroit Pensions	Yes; Attorney Client	Email conveys and relates to legal advice from Jeffrey Ellman, Jones Day	
329	6/13/2013	Dana Gorman <DTG@ABMAC.COM>	Kevyn Orr <orrk@detroitmi.gov>; Chuck Dohrenwend <COD@ABMAC.COM>; Bill Nowling <NowlingB@detroitmi.gov>; bbennett@JonesDay.com; bberens@JonesDay.com; cball@JonesDay.com; dgheiman@JonesDay.com; hlennox@JonesDay.com; jbellman@JonesDay.com; james.doak@millerbuckfire.com; ken.buckfire@millerbuckfire.com; kyle.herman@millerbuckfire.com	Charles Burgess <CLB@ABMAC.COM>; Erin Smith <EKS@ABMAC.COM>; Ron Iori <RHI@ABMAC.COM>				
330	6/7/2013	Gaurav.Malhotra@ey.com	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Juan.Santambrogio@ey.com; Shavi.Sarna@ey.com; Daniel.Jerneycic@ev.com	Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
331	6/19/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; 'Workman, Wayne' <WWWorkman@rwbaird.com>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email containing discussion regarding Chapter 9 filing, withheld under common interest doctrine	
332	6/19/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	wworkman@rwbaird.com; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to communications seeking legal advice from Frederick Headen	
333	6/13/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to communications seeking legal advice from Frederick Headen	
334	5/31/2013	Jeffrey B Ellman <jbellman@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz%JONESDAY@JonesDay.com; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; orrk@detroitmi.gov; Shani Penn <PennSh@detroitmi.gov>; mayss@detroitmi.gov; Bill Nowling <NowlingB@detroitmi.gov>	Charles M.Moore <cmoore@conwaymackenzie.com>; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman <dgheiman@JonesDay.com>; Corinne Ball <cball@JonesDay.com>; Heather Lennox <hlennox@JonesDay.com>; Bruce Bennett <bbennett@jonesday.com>				
335	5/30/2013	Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
336	5/29/2013	Buckfire, Ken <ken.buckfire@millerbuckfire.com>	'Francavilla, Charles' <charles.francavilla@bankofamerica.com>	'Bruce Bennett' <bbennett@jonesday.com>; 'Martin, Jack' <MartinJack@detroitmi.gov>; Nacos, James E <james.nacos@baml.com>; Guinn, Mark A -Legal <mark.a.guinn@bankofamerica.com>; Curland, Edward H <edward.curland@baml.com>; 'Corinne Ball' <cball@JonesDay.com>; 'Heather Lennox' <hlennox@JonesDay.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Doak, James <james.doak@millerbuckfire.com>	Detroit Pensions	Yes; Attorney Client; Produce-Redact	Email containing communications conveying and relating to legal advice from Jones Day	
					Detroit Pensions	Yes; Attorney Client	Email regarding communication of legal advice	

337	5/29/2013	Heather Lennox <hlennox@JonesDay.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	ken.buckfire@millerbuckfire.com; Doak, James <james.doak@millerbuckfire.com>; Bruce Bennett <bbennett@jonesday.com>	Detroit Pensions	Yes; Attorney Client; Work Product	Email regarding provision of legal advice by counsel containing attorney analysis and forwarding report from Ernst & Young prepared at direction of counsel, withheld based upon common interest doctrine	
338	5/20/2013	Gaurav.Malhotra@ey.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email containing legal advice and analysis from Jones Day and forwarding report from Ernst and Young prepared at direction of counsel, withheld based upon common interest doctrine	
339	5/10/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to documents prepared by Heather Lennox, Jones Day	
340	5/10/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (DIFS) <BuhsC@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to documents prepared by Heather Lennox, Jones Day	
341	5/9/2013	Massaron, David P. <Massaron@MillerCanfield.com>	'Workman, Wayne' <WWorkman@rwbaird.com>; Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>	McGuire, Benjamin (Treasury) <McGuireB2@michigan.gov>; Danhof, William J. <Danhof@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Eubanks, Rachael <REubanks@rwbaird.com>; Dembowski, Christopher J. <Dembowski@MillerCanfield.com>	Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
342	5/9/2013	Kevyn Orr <Orrk@detroitmi.gov>	Gaurav.Malhotra@ey.com; David G. Heiman <dgheiman@jonesday.com>; Heather Lennox <hlennox@jonesday.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; James Doak <james.doak@millerbuckfire.com>; ken.buckfire@millerbuckfire.com		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
343	5/9/2013	Heather Lennox <hlennox@JonesDay.com>	Gaurav.Malhotra@ey.com; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; David G. Heiman <dgheiman@JonesDay.com>; Doak, James <james.doak@millerbuckfire.com>; ken.buckfire@millerbuckfire.com; orrk@detroitmi.gov; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
344	5/9/2013	Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>	'Workman, Wayne' <WWorkman@rwbaird.com>; Massaron, David P. <Massaron@MillerCanfield.com>	McGuire, Benjamin (Treasury) <McGuireB2@michigan.gov>; Danhof, William J. <Danhof@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Eubanks, Rachael <REubanks@rwbaird.com>; Dembowski, Christopher J. <Dembowski@MillerCanfield.com>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
345	5/8/2013	Workman, Wayne <WWorkman@rwbaird.com>	Massaron, David P. <Massaron@MillerCanfield.com>	McGuire, Benjamin (Treasury) <McGuireB2@michigan.gov>; Danhof, William J. <Danhof@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>; Eubanks, Rachael <REubanks@rwbaird.com>; Dembowski, Christopher J. <Dembowski@MillerCanfield.com>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
346	5/8/2013	Massaron, David P. <Massaron@MillerCanfield.com>	McGuire, Benjamin (Treasury) <McGuireB2@michigan.gov>; Danhof, William J. <Danhof@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>; 'Workman, Wayne' <wworkman@rwbaird.com>; Rachael Eubanks <REubanks@rwbaird.com>; Dembowski, Christopher J. <Dembowski@MillerCanfield.com>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
347	4/24/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email relating to draft documents prepared in anticipation of litigation and forwarding legal memoranda and analyses prepared at direction of counsel, withheld based upon common interest doctrine	
348	4/18/2013	Kriss Andrews <AndrewsK@detroitmi.gov>	cgannon@conwaymackenzie.com; cmoore@conwaymackenzie.com; khand@conwaymackenzie.com; Kriss Andrews <AndrewsK@detroitmi.gov>; Jan Anderson <Jan@detroitmi.gov>; Jack Martin <MartinJack@detroitmi.gov>; Maurice McMurray <McMurrayM@detroitmi.gov>; Daniel.Jerneycic@ey.com; Gaurav.Malhotra@ey.com; Juan.Santambrogio@ey.com; Sandra Pierce <Sandy.pierce@firstmerit.com>; kwhipple@hotmail.com; rosenblum@jonesday.com; cball@jonesday.com; David Heiman <dgheiman@jonesday.com>; djkates@jonesday.com; dtmoss@jonesday.com; emiller@jonesday.com; hlennox@jonesday.com; jbellman@jonesday.com; mrudd@jonesday.com; sgriffin@jonesday.com; sjbrogan@jonesday.com; tawilson@jonesday.com; tfcullen@jonesday.com; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; james.doak@millerbuckfire.com; ken.buckfire@millerbuckfire.com; kyle.herman@millerbuckfire.com; sanjay.marken@millerbuckfire.com; stuart.erickson@millerbuckfire.com; vincent.fea@millerbuckfire.com	Shalena Garrett <garretts@detroitmi.gov>; Eunice Hayes <HayesE@detroitmi.gov>; Cherie Polk <PolkC@detroitmi.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>; Playte, Beth (Treasury) <PlayteB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email attaching for review and comment by counsel draft documents prepared in anticipation of litigation and forwarding legal memoranda and analyses prepared at direction of counsel, withheld based upon common interest doctrine	
349	4/15/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	jclark@gmhlaw.com; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email regarding provision of legal advice by counsel	
350	4/12/2013	John Clark <jclark@gmhlaw.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
351	4/12/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from counsel	
352	4/11/2013	Kriss Andrews <AndrewsK@detroitmi.gov>	Jack Martin <MartinJack@detroitmi.gov>; Jan Anderson <Jan@detroitmi.gov>; cgannon@conwaymackenzie.com; cmoore@conwaymackenzie.com; khand@conwaymackenzie.com; Daniel.Jerneycic@ey.com; Gaurav.Malhotra@ey.com; Juan.Santambrogio@ey.com; Sandra Pierce <Sandy.pierce@firstmerit.com>; kwhipple@hotmail.com; rosenblum@jonesday.com; cball@jonesday.com; David Heiman <dgheiman@jonesday.com>; djkates@jonesday.com; dtmoss@jonesday.com; emiller@jonesday.com; hlennox@jonesday.com; jbellman@jonesday.com; mrudd@jonesday.com; sgriffin@jonesday.com; sjbrogan@jonesday.com; tawilson@jonesday.com; tfcullen@jonesday.com; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; james.doak@millerbuckfire.com; ken.buckfire@millerbuckfire.com; kyle.herman@millerbuckfire.com; sanjay.marken@millerbuckfire.com; stuart.erickson@millerbuckfire.com; vincent.fea@millerbuckfire.com	Shalena Garrett <garretts@detroitmi.gov>; Eunice Hayes <HayesE@detroitmi.gov>; Cherie Polk <PolkC@detroitmi.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>; Playte, Beth (Treasury) <PlayteB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
353	3/7/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and attaching attorney edits to draft document	
354	3/6/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
355	3/29/2013	Boyne, David (Treasury) <BoyneD@michigan.gov>	Workman, Wayne <WWorkman@rwbaird.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>; Smith, Jarrod (AG) <SmithJ45@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	

356	3/28/2013	Boyne, David (Treasury) <BoyneD@michigan.gov>	Smith, Jarrod (AG) <SmithJ45@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Fielek, Joseph L. (Treasury) <FIELEKJ@michigan.gov>; 'Workman, Wayne' <WWorkman@rwbaird.com>	Detroit Pensions	Yes; Attorney Client	Email soliciting attorney advice	
357	3/25/2013	McGee, Michael P. <McGee@MillerCanfield.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Warren, Richard W. <swarren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email seeking legal advice	
358	3/25/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	McGee, Michael P. (McGee@MillerCanfield.com)	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
359	3/14/2013	McGee, Michael P. <McGee@MillerCanfield.com>	'Kriss Andrews' <AndrewsK@detroitmi.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
360	3/13/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from Michael McGee, Miller Canfield	
361	3/11/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
362	3/8/2013	Nic Hutnyak <Nicolas.Hutnyak@firstsw.com>	Rupley, Jerry T. <Rupley@MillerCanfield.com>; McGee, Michael P. <McGee@MillerCanfield.com>	'martinjack@detroitmi.gov'; 'Kriss Andrews' <AndrewsK@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email containing legal advice	
363	3/8/2013	Rupley, Jerry T. <Rupley@MillerCanfield.com>	'Nic Hutnyak' <Nicolas.Hutnyak@firstsw.com>; McGee, Michael P. <McGee@MillerCanfield.com>	'martinjack@detroitmi.gov'; 'Kriss Andrews' <AndrewsK@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; 'Dave Brayshaw' <Dave.Brayshaw@firstsw.com>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
364	3/8/2013	Nic Hutnyak <Nicolas.Hutnyak@firstsw.com>	Rupley, Jerry T. <Rupley@MillerCanfield.com>; McGee, Michael P. <McGee@MillerCanfield.com>	'martinjack@detroitmi.gov'; 'Kriss Andrews' <AndrewsK@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dave Brayshaw <Dave.Brayshaw@firstsw.com>	Detroit Pensions	Yes; Attorney Client	Email containing legal advice	
365	3/8/2013	Rupley, Jerry T. <Rupley@MillerCanfield.com>	'Nic Hutnyak' <Nicolas.Hutnyak@firstsw.com>; McGee, Michael P. <McGee@MillerCanfield.com>	'martinjack@detroitmi.gov'; 'Kriss Andrews' <AndrewsK@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; 'Dave Brayshaw' <Dave.Brayshaw@firstsw.com>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
366	3/7/2013	McGee, Michael P. <McGee@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
367	3/7/2013	McGee, Michael P. <McGee@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
368	3/5/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
369	3/5/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Nichols, Susan R. (Treasury) <NicholsS4@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
370	3/4/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
371	2/28/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email soliciting attorney advice	
372	2/28/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
373	2/28/2013	Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>; Vaughn, Cary J. (Treasury) <VaughnC2@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
374	2/27/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>; Vaughn, Cary J. (Treasury) <VaughnC2@michigan.gov>	Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
375	2/13/2013	Stanton, Terry A. (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=STANTON>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email seeking legal advice	
376	2/7/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen and forwarding attorney memorandum containing legal advice and analysis from Miller Canfield	
377	2/20/2013	Kriss Andrews <AndrewsK@detroitmi.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Jack Martin <MartinJack@detroitmi.gov>	Detroit Pensions	Yes; Work Product	Email discussing matters in anticipation of litigation	
378	2/4/2013	Glenn Bowen <glenn.bowen@milliman.com>	'Kriss Andrews' <AndrewsK@detroitmi.gov>; Gaurav.Malhotra@ey.com; Michael McGee <McGee@MillerCanfield.com>; Suzanne Taranto <suzanne.taranto@milliman.com>	Jack Martin <jm6455370@aol.com>; Jack Martin <MartinJack@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
379	2/4/2013	Kriss Andrews <AndrewsK@detroitmi.gov>	Gaurav.Malhotra@ey.com; Michael McGee <McGee@MillerCanfield.com>; Glenn Bowen <glenn.bowen@milliman.com>; Suzanne Taranto <suzanne.taranto@milliman.com>	Jack Martin <jm6455370@aol.com>; Jack Martin <MartinJack@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
380	2/4/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000529
381	2/3/2013	Glenn Bowen <glenn.bowen@milliman.com>	Suzanne Taranto <suzanne.taranto@milliman.com>; Gaurav.Malhotra@ey.com; Michael McGee <McGee@MillerCanfield.com>	William Andrews <Andrewsk@detroitmi.gov>; Jack Martin <jm6455370@aol.com>; Jack Martin <MartinJack@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
382	2/3/2013	McGee, Michael P. <McGee@MillerCanfield.com>	Gaurav.Malhotra@ey.com	Suzanne Taranto <suzanne.taranto@milliman.com>; Glenn Bowen <glenn.bowen@milliman.com>; William Andrews <Andrewsk@detroitmi.gov>; Jack Martin <jm6455370@aol.com>; Jack Martin <MartinJack@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
383	2/3/2013	Suzanne Taranto <suzanne.taranto@milliman.com>	Gaurav.Malhotra@ey.com; Glenn Bowen <glenn.bowen@milliman.com>; Michael McGee <McGee@MillerCanfield.com>	William Andrews <Andrewsk@detroitmi.gov>; Jack Martin <jm6455370@aol.com>; Jack Martin <MartinJack@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice	
384	2/3/2013	Gaurav.Malhotra@ey.com	Suzanne Taranto <suzanne.taranto@milliman.com>; Glenn Bowen <glenn.bowen@milliman.com>; Michael McGee <McGee@MillerCanfield.com>	William Andrews <Andrewsk@detroitmi.gov>; Jack Martin <jm6455370@aol.com>; Jack Martin <MartinJack@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email to attorneys to obtain legal advice	
385	1/2/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product; Executive Privilege	Email providing legal advice	
386	12/29/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Michael McGee, Miller Canfield	
387	12/28/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Michael McGee, Miller Canfield	
388	12/14/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice regarding edits to attorney draft document	
389	12/14/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Pension	Yes; Attorney Client	Email related to communications seeking legal advice from Frederick Headen regarding edits to draft document	

390	12/14/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email seeking legal advice regarding edits to attorney draft document	
391	12/14/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice regarding edits to attorney draft document	
392	12/14/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email seeking legal advice regarding edits to attorney draft document	
393	10/23/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Produce-Redact	Email contains communications seeking legal advice from Frederick Headen	
394	10/21/2012	Liedel, Steven <SLiedel@dykema.com>	Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
395	10/21/2012	Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>	'sliedel@dykema.com'	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email from attorney providing legal advice	
396	10/21/2012	Spillane Jr., Thomas B. <TSpillane@foley.com>	Kriss Andrews <krissandrews@hotmail.com>	McGee, Michael P. <McGee@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Andrews, Kriss <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and mental impressions	
397	10/21/2012	Kriss Andrews <krissandrews@hotmail.com>	McGee, Michael P. <McGee@MillerCanfield.com>	Spillane Jr., Thomas B. <TSpillane@foley.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Andrews, Kriss <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and mental impressions	
398	10/21/2012	McGee, Michael P. <McGee@MillerCanfield.com>	'Spillane Jr., Thomas B.' <TSpillane@foley.com>	Kriss Andrews <krissandrews@hotmail.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Andrews, Kriss <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and mental impressions	
399	10/21/2012	Spillane Jr., Thomas B. <TSpillane@foley.com>	Spillane Jr., Thomas B. <TSpillane@foley.com>	Kriss Andrews <krissandrews@hotmail.com>; McGee, Michael P. <McGee@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Andrews, Kriss <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and mental impressions	
400	10/20/2012	Spillane Jr., Thomas B. <TSpillane@foley.com>	Kriss Andrews <krissandrews@hotmail.com>	McGee, Michael P. <McGee@MillerCanfield.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Andrews, Kriss <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and mental impressions	
401	10/20/2012	McGee, Michael P. <McGee@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; 'Spillane Jr., Thomas B.' <TSpillane@foley.com>; 'Andrews, Kriss' <AndrewsK@detroitmi.gov>; 'Andrews, Kriss' <krissandrews@hotmail.com>; McGee, Michael P. <McGee@MillerCanfield.com>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
402	10/20/2012	Kriss Andrews <krissandrews@hotmail.com>	'McGee, Michael P.' <McGee@MillerCanfield.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; 'Steven Liedel' <sliedel@dykema.com>; 'Andrews Kriss' <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and conveying attorney mental impressions	
403	10/20/2012	McGee, Michael P. <McGee@MillerCanfield.com>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>; Andrews Kriss <AndrewsK@detroitmi.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and conveying attorney mental impressions	
404	10/20/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	McGee, Michael P. <McGee@MillerCanfield.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Steven Liedel <sliedel@dykema.com>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and mental impressions	
405	7/2/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	TSpillane@foley.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Sandra E. Pierce <sandy.pierce@firstmerit.com>	Emergency Manager Appointment	Yes; Attorney Client	Email seeking legal advice	
406	6/19/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Koryzno, Edward (Treasury) <KoryznoE@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
407	7/17/2013	TSpillane@foley.com	David G. Heiman <dgheiman@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Gregory Shumaker <gshumaker@JonesDay.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; orrk@detroitmi.gov; Stephen J. Brogan <sjbrogan@JonesDay.com>; Heather Lennox <hlennox@JonesDay.com>; Bruce Bennett <bhbennett@jonesday.com>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email among counsel seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
408	7/17/2013	David G. Heiman <dgheiman@JonesDay.com>	TSpillane@foley.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Gregory Shumaker <gshumaker@JonesDay.com>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; orrk@detroitmi.gov; Stephen J. Brogan <sjbrogan@JonesDay.com>; Heather Lennox <hlennox@JonesDay.com>; Bruce Bennett <bhbennett@jonesday.com>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email among counsel seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
409	7/16/2013	TSpillane@foley.com	David G. Heiman <dgheiman@JonesDay.com>	Gregory Shumaker <gshumaker@JonesDay.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email among counsel seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
410	6/13/2013	Sonya Mays <MaysS@detroitmi.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Kevin Orr <OrRK@detroitmi.gov>; Tedder, Greg (GOV) <tdderg@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email and attachments conveying and relating to legal advice from Jones Day and documents prepared by Jones Day	
411	1/2/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Mark Kaufman, McKenna Long	
412	1/2/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Mark Kaufman, McKenna Long	
413	1/2/2013	Kaufman, Mark <mkaufman@mckennalong.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Mason, Keith <kmason@mckennalong.com>; 'Awilliams@federalcitycouncil.org'; Chandler, Summer <schandler@mckennalong.com>	Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
414	12/5/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attorney mental impressions	



415	6/6/2013	Doak, James <james.doak@millerbuckfire.com>	Doak, James <james.doak@millerbuckfire.com>; Buckfire, Ken <ken.buckfire@millerbuckfire.com>; Charles M. Moore <cmoore@conwaymackenzie.com>; Gaurav.Malhotra@ey.com; Tedder, Greg (GOV) <tedderg@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; David G. Heiman <dgheiman@jonesday.com>; bbennett@jonesday.com; Heather Lennox (hlennox@jonesday.com); VanSickle, Michele (GOV) <vansicklem2@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	'mhicks@jonesday.com'				
416	12/6/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
417	4/19/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
418	7/15/2013	John Clark <jclark@gmhlaw.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email attaching for review and comment by counsel draft documents prepared in anticipation of litigation and forwarding legal memoranda and analyses prepared by Miller Canfield or Jones Day or at direction of counsel, withheld based upon common interest doctrine	
419	12/12/2012	Vaughn, Cary J. (Treasury) <VaughnC2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing attorneys' legal analysis	
420	12/14/2012	Vaughn, Cary J. (Treasury) <VaughnC2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email circulating draft document for review and comment by counsel	
421	12/14/2012	Vaughn, Cary J. (Treasury) <VaughnC2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email circulating draft document for review and comment by counsel	
422	2/25/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking legal advice from Frederick Headen regarding edits to draft document	
423	3/25/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Short, Nancy (GOV) <shortn@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing attorney draft	
424	2/8/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
425	2/9/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	headenf@comcast.net		Emergency Manager Appointment	Yes; Attorney Client	Email sending attorney draft document for review and comment	
426	2/10/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Attorney Client	Email providing legal advice and containing attorney draft	
427	10/22/2012	Liedel, Steven <SLiedel@dykema.com>	Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email and attachment providing legal advice	
428	10/21/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>	sliedel@dykema.com; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
429	6/11/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice	
430	6/4/2013	Gaurav.Malhotra@ey.com	Heather Lennox <hlennox@JonesDay.com>	Bruce Bennett <bbennett@jonesday.com>; David G. Heiman <dgheiman@JonesDay.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>; james.doak@millerbuckfire.com; Kenneth Buckfire (ken.buckfire@millerbuckfire.com); Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email circulating documents for review and comment by Heather Lennox at Jones Day, others	
431	4/19/2013	Juan.Santambrogio@ey.com	Kriss Andrews <AndrewsK@detroitmi.gov>; brosenblum@jonesday.com; cball@jonesday.com; cgannon@conwaymackenzie.com; cmoore@conwaymackenzie.com; Daniel.Jerneycic@ey.com; David Heiman <dgheiman@jonesday.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; djates@jonesday.com; dtmoss@jonesday.com; emiller@jonesday.com; Gaurav.Malhotra@ey.com; Hichez, Amy (Treasury) <HichezA@michigan.gov>; hlennox@jonesday.com; james.doak@millerbuckfire.com; Jan Anderson <Jan@detroitmi.gov>; jbellman@jonesday.com; ken.buckfire@millerbuckfire.com; khand@conwaymackenzie.com; kwhipple@hotmail.com; kyle.herman@millerbuckfire.com; Jack Martin <MartinJack@detroitmi.gov>; Maurice McMurray <McMurrayM@detroitmi.gov>; mrudd@jonesday.com; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Cherie Polk <PolkC@detroitmi.gov>; Sandra Pierce <Sandy.pierce@firstmerit.com>; sanjay.marken@millerbuckfire.com; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; sgriffin@jonesday.com; sjbrogan@jonesday.com; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; stuart.erickson@millerbuckfire.com; tawilson@jonesday.com; tfcullen@jonesday.com; vincent.fay@millerbuckfire.com		Detroit Bankruptcy; Pension	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
432	3/1/2013	Juan.Santambrogio@ey.com	Michael P. McGee <mcpgee@millercanfield.com>; Jack Martin <MartinJack@detroitmi.gov>; AndrewsK@detroitmi.gov; Jan Anderson <Jan@detroitmi.gov>; cgannon@conwaymackenzie.com; cmoore@conwaymackenzie.com; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; james.doak@millerbuckfire.com; ken.buckfire@millerbuckfire.com; khand@conwaymackenzie.com; kyle.herman@millerbuckfire.com; sanjay.marken@millerbuckfire.com; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Glenn M.Kushiner <gkushiner@conwaymackenzie.com>; Maurice McMurray <McMurrayM@detroitmi.gov>	Gaurav.Malhotra@ey.com; Daniel.Jerneycic@ey.com	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email attaching for review and comment by counsel draft documents prepared in anticipation of litigation and forwarding legal memoranda and analyses prepared at direction of counsel, withheld based upon common interest doctrine	
433	10/5/2012	Daniel.Jerneycic@ey.com	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>	Gaurav.Malhotra@ey.com; Juan.Santambrogio@ey.com; andrewsk@detroitmi.gov; Jack Martin <MartinJack@detroitmi.gov>; Chris Brown <CBrown@detroitmi.gov>	Detroit Pensions	Yes; Attorney Client	Email circulating documents for review and comment	
434	7/17/2013	Buckfire, Ken <ken.buckfire@millerbuckfire.com>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>	'orrk@detroitmi.gov'; David G. Heiman <dgheiman@JonesDay.com>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
435	7/12/2013	Jeffrey B Ellman <jbellman@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; orrk@detroitmi.gov; PennSh@detroitmi.gov; mayss@detroitmi.gov; Bill Nowling <NowlingB@detroitmi.gov>	Charles M.Moore <cmoore@conwaymackenzie.com>; gaurav.malhotra@ey.com; ken.buckfire@millerbuckfire.com; David G. Heiman <dgheiman@JonesDay.com>; Corinne Ball <cball@JonesDay.com>; Heather Lennox <hlennox@JonesDay.com>; Bruce Bennett <bbennett@jonesday.com>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from counsel	
436	12/19/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Vaughn, Cary J. (Treasury) <VaughnC2@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Schafer, Suzanne K. (Treasury) <SchaferS7@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	E-mails with attorneys regarding draft Detroit financial information	
437	7/11/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email related to communications seeking legal advice and providing direction to Frederick Headen in preparation of draft documents related to provision of legal advice	
438	6/13/2013	KateKohnParrott <katekohnparrott@gmail.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to communications with Evan Miller, Jones Day	
439	6/13/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	KateKohnParrott <katekohnparrott@gmail.com>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to communications with Evan Miller, Jones Day	
440	6/13/2013	KateKohnParrott <katekohnparrott@gmail.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to communications with Evan Miller, Jones Day	



441	6/13/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; katekohnparrott@gmail.com; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy; Pension	Yes; Attorney Client	Email conveying and relating to communications with Evan Miller, Jones Day	
442	6/13/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Evan Miller <emiller@JonesDay.com>	KateKohnParrott <katekohnparrott@gmail.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Curran, Thomas (Treasury) <CurranT@michigan.gov>; Gaurav Malhotra <Gaurav.Malhotra@ey.com>; Daniel Jerneycic <Daniel.Jerneycic@ev.com>				
443	7/8/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email conveying and relating to communications with Evan Miller, Jones Day	
444	6/4/2013	Heather Lennox <hlennox@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Gaurav.Malhotra@ey.com; james.doak@millerbuckfire.com; ken.buckfire@millerbuckfire.com; Heather Lennox <hlennox@JonesDay.com>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Bruce.Bennett <hbennett@JonesDay.com>					
445	6/3/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
446	5/31/2013	Brya, Michelle (AG) <BryaM@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Arwood, Steve (LARA) <ArwoodS@michigan.gov>; Nixon, John (DTMB) <NixonJ@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email attaching and discussing draft document prepared by Michelle Brya (AG) regarding pending litigation (Davis v. Local Emergency Financial Assistance Loan Board)	
447	4/24/2013	Brya, Michelle (AG) <BryaM@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email attaching and discussing draft document prepared by Michelle Brya (AG) regarding pending litigation (Davis v. Local Emergency Financial Assistance Loan Board)	
448	4/23/2013	Brya, Michelle (AG) <BryaM@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Booth, Joshua O. (AG) <BoothJ2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email attaching and discussing draft document prepared by Michelle Brya (AG) regarding pending litigation (Davis v. Local Emergency Financial Assistance Loan Board)	
449	3/13/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing attorney's legal analysis	
450	2/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to draft documents sent by Fred Headen in connection with provision of legal advice	
451	12/27/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	[Name] <[Address]@sbcglobal.net>	Baird, Richard (GOV) <bairdr@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000534
452	7/11/2013	Kevyn Orr <orrk@detroitmi.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Sonya Mays <MaysS@detroitmi.gov>				
453	6/14/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
454	7/16/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email related to communications with Michael Gadola regarding provision of legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
455	7/16/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Detroit Bankruptcy	Yes; Work Product	Email related to communications with Michael Gadola regarding provision of legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
456	2/5/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Roberts, John (GOV) <robertsJ9@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000845
457	2/4/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsJ9@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40000847
458	3/27/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
459	6/13/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email seeking legal advice	
460	2/25/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsJ9@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client	Email related to communications regarding legal document drafted by Fred Headen	
461	4/19/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
462	2/7/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen and forwarding attorney memorandum containing legal advice and analysis from Miller Canfield	
463	2/7/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen and Miller Canfield and forwarding attorney memorandum containing same	
464	1/18/2013	Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Koryzno, Edward (Treasury) <KoryznoE@michigan.gov>; Falik, Tom A. (Treasury) <FalikT@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to counsel's provision of legal advice and attaching draft documents for review by counsel in connection with provision of legal advice	
465	3/7/2013	McGee, Michael P. <McGee@MillerCanfield.com>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Kriss Andrews <AndrewsK@detroitmi.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
466	12/21/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email contains communications seeking legal advice from counsel	
467	7/9/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Jones Day	
468	7/9/2013	Orr, Kevyn (Treasury) <Orrk2@michigan.gov>	Heather Lennox <hlennox@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; David G. Heiman <dgheiman@JonesDay.com>; cmoore@conwaymackenzie.com; Tedder, Greg (GOV) <tdderg@michigan.gov>; Evan Miller <emiller@JonesDay.com>; Baird, Richard (GOV) <bairdr@michigan.gov>; gaurav.malhotra@ey.com				
469	7/9/2013	Heather Lennox <hlennox@JonesDay.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	David G. Heiman <dgheiman@JonesDay.com>; cmoore@conwaymackenzie.com; Tedder, Greg (GOV) <tdderg@michigan.gov>; Evan Miller <emiller@JonesDay.com>; Baird, Richard (GOV) <bairdr@michigan.gov>; gaurav.malhotra@ey.com; Orr, Kevyn (Treasury) <Orrk2@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email seeking legal advice	
470	12/20/2012	McGee, Michael P. <McGee@MillerCanfield.com>	Kriss Andrews <AndrewsK@detroitmi.gov>; 'Martin, Jack' <MartinJack@detroitmi.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
471	2/25/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing attorney draft	
472	2/20/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>				
473	1/31/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
474	1/23/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	McTavish, Thomas (OAG) <TMcTavish@audgen.michigan.gov>	Murray, Craig (OAG) <CMurray@audgen.michigan.gov>; Bierstetel, Jill (OAG) <JBierstetel@audgen.michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email from counsel stating legal advice and mental impressions regarding litigation	
475	12/14/2012	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (DIFS) <BuhsC@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
476	12/14/2012	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
477	6/3/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email containing legal advice and edits to draft document	
478	4/25/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email requesting legal advice	
					Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking legal advice	

479	3/19/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email providing legal advice	
480	11/27/2012	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
481	7/16/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Produce-Redact	Email soliciting attorney advice from Michael Gadola	
482	7/2/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Fred Headen	
483	3/25/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email containing attorney directions and edits to draft document	
484	3/25/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email containing legal advice and edits to draft document	
485	3/13/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching draft documents in connection with provision of legal advice	
486	3/6/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
487	5/2/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy; Pension	Yes; Attorney Client; Work Product	Email forwarding report from Miller Buckfire prepared at direction of counsel, withheld based upon common interest doctrine	
488	12/26/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
489	2/8/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and forwarding attorney's edits to document	
490	7/18/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Murphy, Michael (AG) <MurphyM2@michigan.gov>	Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client	Email circulating attorney memorandum and draft documents containing legal advice for review by counsel in connection with provision of legal advice	
491	3/21/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Brya, Michelle (AG) <BryaM@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Meingast, Heather (AG) <MeingastH@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
492	3/18/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <robertsJ@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
493	3/14/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and containing attorney draft	
494	6/26/2013	Shani Penn <PennSh@detroitmi.gov>	Ellman, 'Jeffrey.B.jbellman@JonesDay.com; Orr, Kevyn (Treasury) <OrrK2@michigan.gov>; Bassett, Laura.M.Bassett@millercanfield.com; McGee, Michael.P.McGee@millercanfield.com	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Tedder, Greg (GOV) <teddere@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
495	3/11/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
496	1/15/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
497	12/11/2012	Ryan, Howard (Treasury) <RyanH1@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		EM Legislation	Yes; Attorney Client	Email seeking legal advice	
498	4/8/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email forwarding report from Ernst & Young prepared at direction of counsel, withheld based upon common interest doctrine	
499	7/3/2013	Charles M. Moore <cmoore@conwaymackenzie.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Braeutigam, Jon (Treasury) <JBraeuti@invest.treas.state.mi.us>; Evan Miller <emiller@jonesday.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day	
500	6/4/2013	Heather Lennox <hlennox@JonesDay.com>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Gaurav.Malhotra@ey.com; Hichez, Amy (Treasury) <HichezA@michigan.gov>; james.doak@millerbuckfire.com; Kenneth Buckfire (ken.buckfire@millerbuckfire.com); Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Bruce Bennett <bbennett@jonesday.com>; David G. Heiman <dgheiman@JonesDay.com>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
501	6/3/2013	Heather Lennox <hlennox@JonesDay.com>	Hichez, Amy (Treasury) <HichezA@michigan.gov>	Gaurav.Malhotra@ey.com; james.doak@millerbuckfire.com; Kenneth Buckfire (ken.buckfire@millerbuckfire.com); Pleyte, Beth (Treasury) <PleyteB@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email related to communications seeking legal advice and analyses prepared in preparation for litigation	
502	5/14/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Buckfire, Ken <ken.buckfire@millerbuckfire.com>	Doak, James <james.doak@millerbuckfire.com>; Lennox Heather <hlennox@jonesday.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
503	5/10/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (DIFS) <BuhsC@michigan.gov>	Buhs, Caleb (DIFS) <BuhsC@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email forwarding message from Heather Lennox of Jones Day conveying and relating to legal advice from counsel	
504	5/12/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing legal advice and containing attorney draft in pending litigation	
505	7/12/2013	Brya, Michelle (AG) <BryaM@michigan.gov>	Robert, Carla M. (Treasury) <RobertC@michigan.gov>; Booth, Joshua O. (AG) <BoothJ2@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email forwarding message from Michael Gadola conveying and relating to legal advice from counsel	
506	3/27/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying draft summary from counsel and relating to legal advice from counsel	
507	5/12/2013	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Bill Nowling <NowlingB@detroitmi.gov>		Detroit Bankruptcy; Pension	Yes; Attorney Client	Email conveying messages from Jones Day lawyers and relating to legal advice from counsel and discussing draft documents	
508	6/13/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Brown, Melanie (LARA) <BrownM45@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email requesting advice of counsel	
509	6/20/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email attaching counsel's legal advice and mental impressions regarding litigation	
510	6/20/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Brya, Michelle (AG) <BryaM@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen regarding edits to attorney draft document	
511	5/17/2013	Stanton, Terry A. (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=STANTONT>	Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Koryzno, Edward (Treasury) <KoryznoE@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email regarding directions to and opinions of counsel and edits to draft document	
512	2/10/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Michael Gadola and discussing draft document	
513	3/7/2013	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client		
514	3/13/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client		
515	4/14/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Green, Saul A. <greens@millercanfield.com>	John Clark <jclark@gmhlaw.com>; Sachs, Kenneth J. <Sachs@MillerCanfield.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Willems, John H. <willems@millercanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Hathaway, Irene Bruce <HathawayI@MillerCanfield.com>; Evan Miller <emiller@JonesDay.com>; Sarah Griffin <sgriffin@JonesDay.com>	Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	

516	4/15/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	John Clark <jclark@gmhlaw.com>; Green, Saul A. <greens@millercanfield.com>	Sachs, Kenneth J. <Sachs@MillerCanfield.com>; Crockett, Michelle P. <crockett@millercanfield.com>; Alaimo, Michael A. <Alaimo@MillerCanfield.com>; Willems, John H. <willems@millercanfield.com>; Bulger, Harold W., Jr. <bulger@millercanfield.com>; Hathaway, Irene Bruce <Hathaway@MillerCanfield.com>; 'Evan Miller' <emiller@JonesDay.com>; 'Sarah Griffin' <sgriffin@JonesDay.com>				
517	4/15/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	emiller@jonesday.com		Detroit Pensions	Yes; Attorney Client	Email correspondence regarding obtaining legal advice	
518	4/16/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Evan Miller <emiller@JonesDay.com>	Warren, Richard W. <warren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
519	4/16/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Evan Miller <emiller@JonesDay.com>	Warren, Richard W. <warren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
520	4/16/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Evan Miller <emiller@JonesDay.com>	Warren, Richard W. <warren@millercanfield.com>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
521	5/10/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Jones Day and Miller Canfield	
522	3/15/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
523	3/13/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
524	3/13/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
525	3/12/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	EM Legislation; Emergency Manager Appointment; Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
526	3/6/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
527	3/5/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Darling, Richard J. (Treasury) <DarlingR@michigan.gov>; Nichols, Susan R. (Treasury) <NicholsS4@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email sending attorney draft document for review and comment by counsel and containing legal advice and analysis	
528	2/12/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
529	6/6/2013	Liedel, Steven <SLiedel@dykema.com>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email providing legal advice	
530	3/20/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email containing legal advice and attaching attorney edits to draft document	
531	3/20/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
532	3/20/2013	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
533	3/20/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email providing legal advice	
534	10/18/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Ryan, Howard (Treasury) <RyanH1@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email seeking advice of counsel	
535	12/18/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	EM Legislation	Yes; Attorney Client; Produce-Redact	Email including communications to Frederick Headen seeking legal advice regarding draft document	
536	12/18/2012	Ryan, Howard (Treasury) <RyanH1@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Braeutigam, Jon (Treasury) <JBraeuti@invest.treas.state.mi.us>	EM Legislation	Yes; Attorney Client	Email seeking legal advice regarding proposed legislation	
537	7/2/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>	EM Legislation	Yes; Attorney Client; Produce-Redact	Email seeking legal advice regarding proposed legislation	
538	5/16/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
539	3/25/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email between counsel stating legal advice and mental impressions	
540	3/18/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
541	3/18/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <robertsJ9@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
542	3/13/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Elworth, George (AG) <elworthg@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
543	3/13/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	Murphy, Michael (AG) <MurphyM2@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
544	3/7/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
545	3/6/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
546	3/6/2013	Headen, Frederick (Treasury) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HEADENF>	MacDowell, Mary G. (Treasury) <MacDowellM@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Lamphier, Wendy (Treasury) <LAMPHERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
547	1/7/2013	Hichez, Amy (Treasury) <HichezA@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	
548	12/11/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Ryan, Howard (Treasury) <RyanH1@michigan.gov>; Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email forwarding email between Michael P. McGee of Miller Canfield and Kriss Andrews of the City of Detroit providing legal advice	
549	12/4/2012	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Fraser, Roger (Treasury) <FraserR1@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Ryan, Howard (Treasury) <RvanH1@michigan.gov>		EM Legislation	Yes; Attorney Client	Email to attorney seeking legal advice	
550	12/4/2012	Fraser, Roger (Treasury) <FraserR1@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Ryan, Howard (Treasury) <RvanH1@michigan.gov>	Fraser, Roger (Treasury) <FraserR1@michigan.gov>	EM Legislation	Yes; Attorney Client	Email providing legal advice	
551	3/8/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>		EM Legislation	Yes; Attorney Client	Email soliciting attorney advice regarding draft bill language	
					Detroit Pensions	Yes; Attorney Client; Work Product	Email from counsel communicating legal advice from Michael McGee and Jerry Rupley of Miller Canfield	



552	5/20/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft and comments	
553	4/16/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email providing legal advice	
554	4/15/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; jclark@gmhlaw.com	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
555	4/12/2013	John Clark <jclark@gmhlaw.com>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email regarding provision of legal advice by counsel	
556	4/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	John Clark <jclark@gmhlaw.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
557	2/9/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Chuck Moore <cmoore@conwaymackenzie.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
558	5/9/2013	Heather Lennox	Kevyn Orr; Bill Nowling		Pension	Yes; Attorney Client	Memorandum regarding legal strategy	
559	7/19/2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation	
560	4/8/2013	Miller Buckfire			Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client; Work Product	Report prepared by Miller Buckfire for Detroit restructuring team including Jones Day in anticipation of litigation	
561	7/15/2013	Jones Day			Detroit Bankruptcy; Detroit Pensions	Yes; Work Product	Presentation prepared by counsel in anticipation of litigation	
562	5/9/2013	Jones Day			Detroit Pensions	Yes; Attorney Client; Work Product	Draft document from the Governor's office regarding anticipated litigation with comments from Jones Day	
563	7/8/2013	Jones Day	Governor's office		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Working draft of a legal document prepared by Jones Day with handwritten comments	
564	7/19/2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation with handwritten edits	
565	7/12/2013	Jones Day			Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation with handwritten edits	
566	7/11/2013	Jones Day			Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation	
567	7/11/2013	Jones Day			Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation	
568	7/18/2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation with handwritten edits	
569	early July 2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation with handwritten edits	
570	7/12/2013	Jones Day			Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation with handwritten edits	
571	7/19/2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day related to anticipated litigation with handwritten edits	
572	7/17/2013	Matthew Schneider	Michael Gadola		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Memorandum regarding anticipated litigation with handwritten notes	
573	7/12/2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day regarding anticipated litigation	
574	7/8/2013	Jones Day			Detroit Bankruptcy	Yes; Attorney Client; Work Product	Draft document from Jones Day regarding anticipated litigation with handwritten edits	
575	7/9/2013	Jones Day			Detroit Bankruptcy; Detroit Pensions	Yes; Attorney Client; Work Product	Draft document from Jones Day regarding anticipated litigation with attorney edits	
576	12/13/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email related to communications seeking and providing legal advice from Frederick Headon and attaching attorney draft with comments	
577	2/7/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Attorney Client	Email and attachment circulating draft memorandum prepared by Frederick Headon containing legal advice	
578	2/19/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
579	6/13/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Pension	Yes; Attorney Client	Email conveying and relating to legal advice from Jones Day and discussing draft document	
580	3/13/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>; Rospond, Laurie (GOV) <rospndl@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Quebbeman, Marsha (GOV) <quebbemanm@michigan.gov>; McBride, Bill (GOV) <mcbrideb@michigan.gov>; Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>; Terri Reid (terri@reidfinance.com); Roberts, John (GOV) <roberts9@michigan.gov>; Clayton, Stacie (GOV) <claytons3@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Gasper, Joe (MSP) <GasperJ@michigan.gov>; Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Hollins, Harvey (GOV) <hollins@michigan.gov>; Sachs, Stephen (GOV) <sachss@michigan.gov>; VanSickle, Michele (GOV) <vansicklem2@michigan.gov>; Forstner, Nathaniel (GOV) <forstner1@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>	Smith, Jennifer (GOV) <smithj32@michigan.gov>; Silfven, Ken (GOV) <silfvenk@michigan.gov>				
581	12/1/2012	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
582	4/1/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD-R>	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from Steven Liedel of Dykema	
583	4/5/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Snyder, Rick (GOV) <snryderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Tedder, Greg (GOV) <tedderrg@michigan.gov>	Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
584	7/18/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Snyder, Rick (GOV) <snryderr11@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Detroit Bankruptcy	Yes; Executive Privilege	Email forwarding document containing privileged and work product information regarding anticipated litigation; remaining attachment contains Governor's briefing and is entirely nonresponsive	
585	7/18/2013	Ellison, Melanie (GOV) <EllisonM2@michigan.gov>	Snyder, Rick (GOV) <snryderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Confer, Karen (GOV) <conferk@michigan.gov>; Ellison, Melanie (GOV) <EllisonM2@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice	
586	7/17/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Snyder, Rick (GOV) <snryderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Detroit Bankruptcy	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40001006
587	7/17/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Snyder, Rick (GOV) <snryderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and related to communications seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
588	1/30/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Snyder, Rick (GOV) <snryderr11@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
589	12/3/2012	Baird, Richard (GOV) <bairdr@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40001039
590	12/3/2012	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD-R>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking and providing legal advice from Steven Liedel of Dykema and attaching attorney draft with comments	
591	12/17/2012	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD-R>	Snyder, Rick (GOV) <snryderr11@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking and providing legal advice from Steven Liedel of Dykema and attaching attorney draft with comments	
					Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate	

592	12/17/2012	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate	
593	1/6/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Richard McLellan <rdmclellan6633@gmail.com>; Snyder, Rick (GOV) <snyderr11@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate	
594	1/6/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Scott, Allison (GOV) <scotta12@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate	
595	1/6/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	[Name] <[Address]@sbcglobal.net>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted	SOM4001046
596	1/6/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Scott, Allison (GOV) <scotta12@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40001049
597	1/6/2013	[Name] <[Address]@sbcglobal.net>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted	
598	1/6/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Muchmore, Dennis (GOV) <muchmored@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted	SOM40001052
599	1/15/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Snyder, Rick (GOV) <Snyderr12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate	
600	1/16/2013	[Name] <[Address]@gmail.com>	Scott, Allison (GOV) <scotta12@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email attaching resume of emergency manager candidate	
601	1/17/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emergency Manager Appointment	Yes; Executive Privilege	Emergency manager candidate information	
602	2/21/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
603	2/22/2013	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate	
604	2/22/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	[Name] <[Address]@gmail.com>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40001056
605	3/1/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email with emergency manager candidate	
606	3/8/2013	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	
607	3/11/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRD<	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate	
608	11/19/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Durfee, Sally (GOV) <durfees@michigan.gov>; Ryan, Howard (Treasury) <RyanH1@michigan.gov>		EM Legislation	Yes; Attorney Client	Email providing legal advice and attaching Frederick Headon's draft documents in connection with provision of legal advice	
609	3/12/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Hansen, Rachel (GOV) <hansenr3@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emergency Manager Appointment	Yes; Excecutive Privilege; Produce-Redact	Unrelated and unresponsive Governor's briefing information redacted	
610	6/5/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>; Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Pleyte, Beth (Treasury) <PleyteB@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client; Work Product	Email containing attorney work product from Jones Day and legal advice, attachment containing same	
611	5/10/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice from Jones Day	
612	12/28/2012	Roberts, John (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ROBERTSJ9>	Emmitt, Beth (GOV) <emmittb@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40001557
613	4/25/2013	GovCalendar </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOVCALENDAR>	Rospond, Laurie (GOV) <rospndl@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Clayton, Stacie (GOV) <claytons3@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; VanSickle, Michele (GOV) <vansicklem2@michigan.gov>; Adamczyk, Lynne (GOV) <adamczyk@michigan.gov>; Orr, Kevyn (Treasury) <OrrK2@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Hollins, Harvey (GOV) <hollinsh@michigan.gov>; Saunders, Kelli (GOV) <saundersk1@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>			Email conveying and related to communications with Jones Day seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
614	5/10/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product; Not Sure	Email conveying and relating to legal advice from Jones Day and attaching draft documents prepared in anticipated litigation	
615	3/26/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email attaching resume of emergency manager candidate	
616	12/26/2012	Baird, Richard (GOV) <bairdr@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege		
617	3/1/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Hansen, Rachel (GOV) <hansenr3@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Wurfel, Sara (GOV) <WurfelS@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Executive Privilege; Produce-Redact	Unrelated and unresponsive Governor's briefing information redacted	
618	12/28/2012	Scott, Allison (GOV) <scotta12@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>		Emergency Manager Appointment; Pension	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40001911
619	3/13/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Emmitt, Beth (GOV) <emmittb@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing communications with Michael Gadola and Frederick Headen seeking legal advice regarding draft document	
620	3/13/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Emmitt, Beth (GOV) <emmittb@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing communications with Michael Gadola and Frederick Headen seeking legal advice regarding draft document	
621	3/13/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Snyder, Rick (GOV) <snyderr11@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing communications with Michael Gadola and Frederick Headen seeking legal advice regarding draft document	
622	3/7/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email conveying and relating to legal advice from counsel	
623	1/14/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Mcbride, Bill (GOV) <mcbrideb@michigan.gov>				
624	1/9/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40002227
625	1/16/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40002229
626	1/10/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Wagner, Scott (GOV) <Wagners2@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40002230

627	1/10/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Wagner, Scott (GOV) <Wagners2@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40002234
628	1/9/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Snyder, Rick (GOV) <snyderr11@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40002235
629	3/20/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Hansen, Rachel (GOV) <hansenr3@michigan.gov>; Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emergency Manager Appointment; Detroit Bankruptcy	Yes; Executive Privilege; Produce-Redact	Unrelated and unresponsive Governor's briefing information redacted	
630	3/13/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>; Hansen, Rachel (GOV) <hansenr3@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact	Unrelated and unresponsive Governor's briefing information redacted	
631	3/2/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email regarding emergency manager candidate; candidate's resume withheld	SOM40002369
632	3/26/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Short, Nancy (GOV) <shortn@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
633	3/13/2013	Scott, Allison (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SCOTTA12>	Rexford, Tori (GOV) <rexfordt@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email forwarding Michael Gadola's revisions to letter	
634	3/13/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email forwarding attorney revisions to letter	
635	5/9/2013	Heather Lennox <hlennox@jonesday.com>	ork@detroitmi.gov; NowlingB@detroitmi.gov	David G. Heiman <dgheiman@jonesday.com>; Jeffrey B Ellman <jbellman@jonesday.com>; Corinne Ball <cball@jonesday.com>; Bruce Bennett <bbennett@jonesday.com>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
636	3/11/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate	
637	3/1/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>; Hansen, Rachel (GOV) <hansenr3@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>; Utley, Corey (GOV) <UtleyC@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emergency Manager Appointment; Pension	Yes; Produce-Redact	Unrelated and unresponsive Governor's briefing information redacted	
638	12/4/2012	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Silfven, Ken (GOV) <silfvenk@michigan.gov>	Buhs, Caleb (DIFS) <BuhsC@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Weiss, Kurt (GOV) <WeissK5@michigan.gov>	EM Legislation	Yes; Attorney Client; Produce-Redact	Email conveying and relating to legal advice from Frederick Headen	SOM30005288
639	3/12/2013	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Buhs, Caleb (GOV) <BuhsC2@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>		Emergency Manager Appointment	NonResponsive; Yes; Attorney Client	Email forwarding legal advice from counsel	
640	3/14/2013	Wurfel, Sara (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=WURFELS>	Rexford, Tori (GOV) <rexfordt@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email and attachment containing communications related to provision of legal advice by Michael Gadola	
641	12/5/2012	Stanton, Terry A. (Treasury) <StantonT@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Silfven, Ken (GOV) <silfvenk@michigan.gov>; Weiss, Kurt (GOV) <WeissK5@michigan.gov>	Buhs, Caleb (DIFS) <BuhsC@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	EM Legislation	Yes; Attorney Client	Email conveying and relating to legal advice from Frederick Headen	
642	5/10/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Jones Day	
643	5/10/2013	Roberts, John (GOV) <roberts9@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from Jones Day	
644	5/13/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Brownfield, Michael (GOV) <BrownfieldM2@michigan.gov>; Brownlee, Jeff (DTMB) <Brownleel@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; McBride, Bill (GOV) <mcbrideb@michigan.gov>; Calley, Brian (GOV) <calleyb11@michigan.gov>; Leonard, Jenell (GOV) <leonardj1@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Posthumus, Dick (GOV) <Posthumusd@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Brader, Valerie (GOV) <braderv@michigan.gov>; Hollins, Harvey (GOV) <hollinsh@michigan.gov>; Tomich, Zak (GOV) <tomichz@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
645	2/20/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM40002547
646	9/27/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Rustem, William (GOV) <rustemw@michigan.gov>; Hall, Jean (GOV) <hallj16@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email conveying and related to communications with Frederick Headen seeking legal advice regarding anticipated litigation and discussing plans in preparation for litigation	
647	3/18/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>; Arwood, Cheri (GOV) <ArwoodC@michigan.gov>; Harden, Carolyn (GOV) <hardenc@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
648	3/26/2013	Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Short, Nancy (GOV) <shortn@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email containing legal advice and edits to draft document	
649	3/11/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email related to communications seeking and providing legal advice and attaching attorney draft with comments	
650	4/16/2013	Doctoroff, Andrew (MEDC) <doctoroffa@michigan.org>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Hilfinger, Steve (MEDC) <hilfingers@michigan.org>; Francart, Kevin (MLB) <FrancartK@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email soliciting attorney advice	
651	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email soliciting attorney advice	
652	11/15/2012	Bandstra, Richard (AG) <BandstraR@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>		EM Legislation	Yes; Attorney Client	Email related to communications seeking and providing legal advice and attaching attorney draft with comments	
653	5/9/2013	Keryn Orr <OrrK@detroitmi.gov>	Gaurav.Malhotra@ey.com; David G. Heiman <dgheiman@jonesday.com>; Heather Lennox <hlennox@jonesday.com>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Tedder, Greg (GOV) <tedderg@michigan.gov>; James Doak <james.doak@millerbuckfire.com>; ken.buckfire@millerbuckfire.com		Detroit Pensions	Yes; Attorney Client	Email conveying and relating to legal advice from counsel and discussing draft document	



654	5/9/2013	Heather Lennox <hlennox@JonesDay.com>	Gaurav.Malhotra@ey.com; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Tedder, Greg (GOV) <tdderg@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; David G. Heiman <dgheiman@JonesDay.com>; Doak, James <james.doak@millerbuckfire.com>; ken.buckfire@millerbuckfire.com; orrk@detroitmi.gov; Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>				
655	5/9/2013	Tedder, Greg (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=TEDDERG>	Baird, Richard (GOV) <bairdr@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice
656	4/5/2013	Tedder, Greg (GOV) <tdderg@michigan.gov>	Rexford, Tori (GOV) <rexfordt@michigan.gov>		Detroit Pensions	Yes; Attorney Client; Work Product	Email conveying and relating to draft documents prepared by Heather Lennox, Jones Day
657	3/26/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Reid, Teresa (GOV) <reidt@michigan.gov>; Tedder, Greg (GOV) <tdderg@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email forwarding document containing legal advice and prepared at the direction of Jones Day
658	2/28/2013	[Name]@aol.com	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments
659	2/22/2013	[Name] <[Address]@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
660	1/10/2013	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
661	1/10/2013	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted
662	1/8/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Rospond, Laurie (GOV) <rospondl@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
663	1/8/2013	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted
664	1/8/2013	[Name] <[Address]@sbcbglobal.net>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email and attachment containing information regarding emergency manager candidate; name of candidate redacted
665	1/7/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document prepared by attorney Richard McLellan; contains information regarding emergency manager candidate
666	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document prepared by attorney Richard McLellan; contains information regarding emergency manager candidate
667	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document prepared by attorney Richard McLellan; contains information regarding emergency manager candidate
668	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document prepared by attorney Richard McLellan; contains information regarding emergency manager candidate
669	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Richard McLellan <rdmclellan6633@gmail.com>; Snyder, Rick (GOV) <snyderr11@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document prepared by attorney Richard McLellan; contains information regarding emergency manager candidate
670	1/6/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Richard McLellan <rdmclellan6633@gmail.com>; Snyder, Rick (GOV) <snyderr11@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document prepared by attorney Richard McLellan; contains information regarding emergency manager candidate
671	1/6/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Hichez, Amy (Treasury) <HichezA@michigan.gov>; Snyder, Rick (GOV) <snyderr11@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
672	1/4/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
673	4/5/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Emmitt, Beth (GOV) <emmittb@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client; Work Product	Email conveying and relating to documents prepared at the direction of Jones Day
674	6/5/2013	Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>	Detroit Pensions	Yes; Attorney Client; Work Product	Email containing work product from Jones Day attorneys and legal advice, attachment containing same
675	3/12/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	Roberts, John (GOV) <roberts9@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client; Work Product	Email conveying and relating to draft documents prepared by Fred Headen
676	2/22/2013	[Name] <[Address]@babson.edu>	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate
677	2/22/2013	[Name] <[Address]@gmail.com>	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email attaching resume of emergency manager candidate
678	2/21/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email discussing emergency-manager candidate and attaching resume of same
679	3/7/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stanton, Terry A. (Treasury) <StantonT@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Roberts, John (GOV) <roberts9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email forwarding attorney's draft of document to clients including other counsel
680	1/2/2013	Kaufman, Mark <mkaufman@mckennalong.com>	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Mason, Keith <kmason@mckennalong.com>; 'Awilliams@federalcitycouncil.org'; Chandler, Summer <schandler@mckennalong.com>	Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from counsel
681	11/29/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Scorsone, Eric <scorsone@anr.msu.edu>; danhof@millercanfield.com; 'pellsworth@dickinsonwright.com' (pellsworth@dickinsonwright.com); Richard McLellan <rdmclellan@comcast.net>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Hilfinger, Steven (LARA) <HilfingerS@michigan.gov>; Rustem, William (GOV) <rustemw@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		EM Legislation	Yes; Attorney Client; Produce-Redact	Email to counsel seeking legal advice
682	3/12/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRDR>	'Kevyn Orr' <korr@JonesDay.com>		Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email conveying and relating draft documents prepared by Fred Headen
683	1/2/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRDR>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>		Detroit Bankruptcy	Yes; Attorney Client	Email conveying and relating to legal advice from Mark Kaufman, McKenna Long
684	1/28/2013	Baird, Richard (GOV) <bairdr@michigan.gov>	VanSickle, Michele (GOV) <vansicklem2@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidates; name of EM candidate is redacted and resume is withheld
685	2/22/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRDR>	[Name] <[Address]@gmail.com>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
686	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email to and from counsel regarding attorney edits to documents
687	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email to and from counsel regarding attorney edits to documents
688	3/12/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email to and from counsel regarding attorney edits to documents
689	2/7/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to draft memorandum prepared by Fred Headen
690	1/6/2013	Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Hichez, Amy (Treasury) <HichezA@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
691	1/6/2013	Richard McLellan <rdmclellan6633@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>	Richard D. McLellan Esq. Mr. <rdmclellan@comcast.net>	Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from counsel and discussing draft document; contains information regarding emergency manager candidate
692	12/27/2012	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	[Name] <[Address]@sbcbglobal.net>	Baird, Richard (GOV) <bairdr@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>	Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted
693	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Monticello, Frank (AG) <MonticelloF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel
694	3/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email forwarding attorney's legal advice & identifying candidates for emergency manager
695	3/12/2013	Baird, Richard (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BAIRDR>	'Kevyn Orr' <korr@JonesDay.com>		Emergency Manager Appointment	Yes; Attorney Client; Produce-Redact	Email forwarding communications relating to legal advice from Michael Gadola and Fred Headen; privileged emails are redacted
696	2/21/2013	Scott, Allison (GOV) <scotta12@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Executive Privilege	Email discussing emergency-manager candidate and attaching resume of same

697	3/12/2013	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Headen, Frederick (Treasury) <HeadenF@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice	
698	2/12/2013	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to draft documents prepared by Fred Headen	
699	12/12/2012	Tom Elward <twelward@gmail.com>	Baird, Richard (GOV) <bairdr@michigan.gov>		Emergency Manager Appointment	Yes; Produce-Redact; Executive Privilege	Email containing information regarding emergency manager candidate; name of candidate redacted	SOM30007123
700	4/23/2013	Saxton, Thomas (Treasury) <SaxtonT@michigan.gov>	Tedder, Greg (GOV) <tedderg@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email attaching for review and comment by counsel draft documents prepared in anticipation of litigation and forwarding legal memoranda and analyses prepared at direction of Jones Day, withheld based upon common interest doctrine	
701	4/5/2013	Doak, James <james.doak@millerbuckfire.com>	Tedder, Greg (GOV) <tedderg@michigan.gov>	Buckfire, Ken <ken.buckfire@millerbuckfire.com>; Herman, Kyle <kyle.herman@millerbuckfire.com>; David G. Heiman <dgheiman@jonesday.com>; bbennett@jonesday.com; rhall@JonesDay.com	Detroit Bankruptcy; Pension	Yes; Attorney Client; Work Product	Email forwarding document containing information regarding anticipated litigation	
702	3/27/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Baird, Richard (GOV) <bairdr@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email from counsel regarding attorney's edits to attached document	
703	3/13/2013	Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
704	3/13/2013	Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Scott, Allison (GOV) <scotta12@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Cousineau, Sara (Treasury) <CousineauS@michigan.gov>; Smith, Jennifer (GOV) <smithj32@michigan.gov>; Simons, Samantha (GOV) <SimonsS2@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to counsel's provision of legal advice and attaching draft documents for review by counsel in connection with provision of legal advice	
705	3/13/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Roberts, John (GOV) <robertsj9@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking and providing legal advice and attaching attorney draft with comments	
706	5/9/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Ellison, Melanie (GOV) <EllisonM2@michigan.gov>; Emmitt, Beth (GOV) <emmittb@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client; Work Product	Email conveying and relating to legal advice and draft document from Heather Lennox, Jones Day	
707	3/18/2013	Headen, Frederick (Treasury) <HeadenF@michigan.gov>	Monticello, Frank (AG) <MonticelloF@michigan.gov>	Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; Gadola, Michael (GOV) <Gadolam@michigan.gov>; Saari, Norm (GOV) <saarin@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email related to communications providing legal advice and attaching attorney draft with comments	
708	3/27/2013	Gadola, Michael (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GADOLAM>	Headen, Frederick (Treasury) <HeadenF@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>; Lamphier, Wendy (Treasury) <LAMPHIERW@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email providing legal advice and attaching attorney draft documents in connection with provision of legal advice	
709	3/27/2013	Hall, Jean (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HALU16>	Simons, Samantha (GOV) <SimonsS2@michigan.gov>		Detroit Pensions	Yes; Attorney Client	Email related to communications seeking legal advice from Fred Headen and Valerie Brader	
710	1/6/2013	Muchmore, Dennis (GOV) <muchmored@michigan.gov>	Clement, Elizabeth (GOV) <clemente@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client; Executive Privilege	Email conveying and relating to legal advice from Richard McClellan and discussing draft document prepared by McClellan; contains information regarding emergency manager candidate	
711	3/8/2013	Buhs, Caleb (GOV) <BuhsC2@michigan.gov>	Gadola, Michael (GOV) <Gadolam@michigan.gov>	Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Baird, Richard (GOV) <bairdr@michigan.gov>; Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email conveying and relating to legal advice from counsel	
712	3/13/2013	Roberts, John (GOV) </O=MIGOV/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ROBERTSJ9>	Wisniewski, Wendy (GOV) <wisniewski@michigan.gov>		Emergency Manager Appointment	Yes; Attorney Client	Email related to communications seeking and providing legal advice from Michael Gadola and fred Headen and attaching attorney draft with comments from Fred Headen	
713	5/9/2013	Ellison, Melanie (GOV) <EllisonM2@michigan.gov>	Snyder, Rick (GOV) <snyderr11@michigan.gov>	Scott, Allison (GOV) <scotta12@michigan.gov>; Muchmore, Dennis (GOV) <muchmored@michigan.gov>; Roberts, John (GOV) <robertsj9@michigan.gov>	Detroit Bankruptcy; Pension	Yes; Attorney Client	Email forwarding document prepared by counsel and at counsel's direction	
714	4/30/2013	Tedder, Greg (GOV) <tedderg@michigan.gov>	Dan Moss <dtmoss@jonesday.com>		Detroit Pensions	Yes; Attorney Client; Work Product	Email seeking legal advice and attaching documents for review by counsel	
715	5/2/2013	Doak, James <james.doak@millerbuckfire.com>	Buckfire, Ken <ken.buckfire@millerbuckfire.com>; Charles M. Moore <cmoore@conwaymackenzie.com>; Gaurav.Malhotra@ey.com; Tedder, Greg (GOV) <tedderg@michigan.gov>; Dillon, Andy (Treasury) <DillonA2@michigan.gov>; Stibitz, Brom (Treasury) <StibitzB@michigan.gov>; David G. Heiman <dgheiman@jonesday.com>; bbennett@jonesday.com	'mhicks@jonesday.com'; Heather Lennox (hlennox@jonesday.com); Marken, Sanjay <sanjay.marken@millerbuckfire.com>; Herman, Kyle <kyle.herman@millerbuckfire.com>; Fea, Vincent <vincent.fea@millerbuckfire.com>	Detroit Bankruptcy; Pension	Yes; Work Product	Email forwarding report from Miller Buckfire prepared at direction of Jones Day withheld based upon common interest doctrine	
716	3/12/2013	Rexford, Tori (GOV) <rexfordt@michigan.gov>	Holyfield, Jeff (GOV) <HolyfieldJ@michigan.gov>; Wurfel, Sara (GOV) <Wurfels@michigan.gov>; Buhs, Caleb (GOV) <BuhsC2@michigan.gov>	Smith, Jennifer (GOV) <smithj32@michigan.gov>	Emergency Manager Appointment	Yes; Attorney Client	Email sending draft contract prepared by Fred Headen	



UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT  
In Re: City of Detroit, Michigan  
Case No. 13-53846  
State of Michigan  
Second Privilege Log  
October 21, 2013

Item #	Bates ID#	DocType	Date	To	From	Subject	Notes	Privilege Reason
1	SOM0001077	Email	3/12/2013	Brom Stibitz	Frank Monticello	Advice and draft language from counsel regarding appointment of EM.		Attorney Client Communication; Attorney Work Product
2	SOM0001078	Email	3/12/2013	Brom Stibitz	Frank Monticello	Advice and draft language from counsel regarding appointment of EM.	Duplicate of item #1.	Attorney Client Communication; Attorney Work Product
3	SOM0001079	Email	7/17/2013	Jennifer Jackson	Brom Stibitz	Communications to counsel regarding authorization to file Chapter 9.		Attorney Client Communication; Attorney Work Product
4	SOM0001080	Email	6/7/2013	Sonya Mays, Shani Penn, Greg Tedder, Daniel Moss, H Lennox, Brom Stibitz	Bill Nowling	Communications to counsel and advice from counsel regarding creditors meeting.		Attorney Client Communication; Attorney Work Product
5	SOM0001081	Email	6/7/2013	Sonya Mays, Shani Penn, Greg Tedder, Daniel Moss, H Lennox, Brom Stibitz	Bill Nowling	Communications to counsel and advice from counsel regarding creditors meeting.	Duplicate of item #4.	Attorney Client Communication; Attorney Work Product
6	SOM0001082	Email	3/20/2013	Frank Monticello	Brom Stibitz	Inquiries to counsel and advice from counsel regarding pension boards.		Attorney Client Communication
7	SOM0001083	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Email header with no text.	N/A
8	SOM0001084	Email	3/20/2013	Frank Monticello	Brom Stibitz	Inquiries to counsel and advice from counsel regarding pension boards.		Attorney Client Communication; Attorney Work Product
9	SOM0001085	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Email header with no text.	N/A
10	SOM0001086	Email	3/20/2013	Frank Monticello	Brom Stibitz	Inquiries to counsel and advice from counsel regarding pension boards.		Attorney Client Communication; Attorney Work Product
11	SOM0001087	Email	3/20/2013	Frank Monticello	Brom Stibitz	Inquiries to counsel and advice from counsel regarding pension boards.		Attorney Client Communication; Attorney Work Product
12	SOM0001088	Email	3/15/2013	Brom Stibitz, Frank Monticello	Frederick Headen	Inquiries to counsel and advice from counsel regarding pension boards.		Attorney Client Communication; Attorney Work Product
13	SOM0001089	Email	3/18/2013	Frank Monticello, Michael Gadola	Frederick Headen	Communications to counsel and advice from counsel regarding emergency manager contracts.		Attorney Client Communication

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT  
In Re: City of Detroit, Michigan  
Case No. 13-53846  
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Second Privilege Log  
October 21, 2013

Item #	Bates ID#	DocType	Date	To	From	Subject	Notes	Privilege Reason
14	SOM0001090	Email	3/18/2013	Frank Monticello	Frederick Headen	Communications to counsel and advice from counsel regarding emergency manager contracts.		Attorney Client Communication
15	SOM0001091	Email	3/15/2013	Frank Monticello, Frederick Headen	Brom Stibitz	Communications to counsel regarding emergency manager effective date.		Attorney Client Communication
16	SOM0001092	Email	3/11/2013	Brom Stibitz	Frederick Headen	Communications to counsel and advice from counsel regarding emergency manager contracts.		Attorney Client Communication
17	SOM0001093	Draft contract	3/11/2013	Brom Stibitz	Frederick Headen	Draft emergency manager contract from counsel.		Attorney Client Communication; Attorney Work Product
18	SOM0001094	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Email header with no text.	N/A
19	SOM0001095	Email	3/11/2013	Frank Monticello	Brom Stibitz	Advice and draft language from counsel regarding appointment of EM; names of potential candidates for EM.		Attorney Client Communication; Executive Privilege; Protective Order Entered 10/08/13
20	SOM0001096	Resume	3/11/2013	Resume	Resume	Resume of potential EM		Executive Privilege; Protective Order Entered 10/08/13
21	SOM0001097	Resume	3/11/2013	Resume	Resume	Resume of potential EM		Executive Privilege; Protective Order Entered 10/08/13
22	SOM0001098	Email	3/6/2013	Frank Monticello	Frederick Headen	Communications to counsel and advice from counsel regarding appointment of emergency manager.	Upon further review, a portion of the document is not privileged and a redacted version is produced.	Attorney Client Communication; Attorney Work Product
23	SOM0001099	Email	3/6/2013	Frank Monticello	Frederick Headen	Communications to counsel and advice from counsel regarding appointment of emergency manager.	Upon further review, a portion of the document is not privileged and a redacted version is produced.	Attorney Client Communication; Attorney Work Product
24	SOM0001100	Email	3/6/2013	Frank Monticello	Frederick Headen	Communications to counsel and advice from counsel regarding appointment of emergency manager.	Duplicate of item #23.	Attorney Client Communication; Attorney Work Product
25	SOM0001101	Email	3/4/2013	Frederick Headen	Frank Monticello	Inquiries to counsel and advice from counsel regarding pensions.	Upon further review, a portion of the document is not privileged and a redacted version is produced.	Attorney Client Communication

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT  
In Re: City of Detroit, Michigan  
Case No. 13-53846  
State of Michigan  
Second Privilege Log  
October 21, 2013

Item #	Bates ID#	DocType	Date	To	From	Subject	Notes	Privilege Reason
26	SOM0001102	Email	7/2/2013	Brom Stibitz, Andy Dillon	Michelle Brya	Advice from counsel regarding the treatment of candidates for EM.		Attorney Client Communication
27	SOM0001103		Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding status of pension cases.	N/A
28	SOM0001104	Email	3/6/2013	Frank Monticello	Frederick Headen	Communications to counsel and advice from counsel regarding the appointment of emergency manager.	Original email is same as item #22 and unprivileged portion is produced.	Attorney Client Communication; Attorney Work Product
29	SOM0001105	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding status of pension cases.	N/A
30	SOM0001106	Email	3/20/2013	Brom Stibitz	Frank Monticello	Inquiries to counsel and advice from counsel regarding pensions.		Attorney Client Communication; Attorney Work Product
31	SOM0001107	Email	3/20/2013	Brom Stibitz	Frank Monticello	Inquiries to counsel and advice from counsel regarding pensions.	Duplicate of item #30.	Attorney Client Communication; Attorney Work Product
32	SOM0001108	Email	3/20/2013	Brom Stibitz	Frank Monticello	Inquiries to counsel and advice from counsel regarding pensions.	Duplicate of item #30.	Attorney Client Communication; Attorney Work Product
33	SOM0001109	Email	3/20/2013	Brom Stibitz	Frank Monticello	Inquiries to counsel and advice from counsel regarding pensions.	Duplicate of item #30.	Attorney Client Communication; Attorney Work Product
34	SOM0001110	Email	3/7/2013	Frederick Headen	Frank Monticello	Communications to counsel and advice from counsel regarding appointment of emergency manager.	Upon further review, a portion of the document is not privileged and a redacted version is produced.	Attorney Client Communication; Attorney Work Product
35	SOM0001111	Email	3/7/2013	Frederick Headen	Frank Monticello	Communications to counsel and advice from counsel regarding appointment of emergency manager.	Duplicate of item #34.	Attorney Client Communication; Attorney Work Product
36	SOM0001112	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding news stories regarding bankruptcy.	N/A
37	SOM0001113	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Duplicate of item #29.	N/A

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT  
In Re: City of Detroit, Michigan  
Case No. 13-53846  
State of Michigan  
Second Privilege Log  
October 21, 2013

Item #	Bates ID#	DocType	Date	To	From	Subject	Notes	Privilege Reason
38	SOM0001114	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding status of pension cases.	N/A
39	SOM0001115	Email	7/18/2013	Carol Isaacs, Matthew Schneider	Michael Gadola	Email to counsel regarding Joint Defense Agreement.		Attorney Client Communication; Attorney Work Product
40	SOM0001116	Word document	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Draft press release.	N/A
41	SOM0001117	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding pensions.	N/A
42	SOM0001118	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding pensions.	N/A
43	SOM0001119	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding eligibility.	N/A
44	SOM0001120	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding eligibility objections.	N/A
45	SOM0001121	Memorandum	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal memo regarding article 9 Section 24	N/A
46	SOM0001122	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal email from AG Office regarding motion to stay eligibility objections.	N/A
47	SOM0001123	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Duplicate of item #46.	N/A
48	SOM0001124	Draft brief	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Internal draft of brief on stay eligibility.	N/A
49	SOM0001125	Memorandum	7/17/2013	Michael Gadola	Matthew Schneider	Memorandum providing legal advice regarding potential risks to the State of Michigan in a Detroit Bankruptcy.		Attorney Client Communication; Attorney Work Product
50	SOM0001126	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.				Duplicate of item #42.	N/A
51	SOM0001127	Email	12/27/2012	Brom Stibitz	Frank Monticello	Inquiries to counsel and advice from counsel regarding appointment of emergency manager.	Upon further review, a portion of the document is not privileged and a redacted version is produced.	Attorney Client Communication; Attorney Work Product
52	SOM0001128	Email	2/22/2013	Frank Monticello	Robert Ianni	Internal AG discussion regarding effect of bankruptcy on pensions.		Attorney Work Product

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT  
In Re: City of Detroit, Michigan  
Case No. 13-53846  
State of Michigan  
Second Privilege Log  
October 21, 2013

Item #	Bates ID#	DocType	Date	To	From	Subject	Notes	Privilege Reason
53	SOM0001129	Email	2/25/2013	Frank Monticello	Robert Ianni	Internal AG discussion regarding effect of bankruptcy on pensions.	Extension of conversation in item #52.	Attorney Work Product
54	SOM0001130	Memorandum	Upon further review, this document should not have been included with privilege log. It is nonresponsive.					Duplicate of item #45. N/A
55	SOM0001131	Memorandum	7/17/2013	Michael Gadola	Matthew Schneider	Memorandum providing legal advice regarding potential risks to the State of Michigan in a Detroit Bankruptcy.	Duplicate of item #49.	Attorney Client Communication; Attorney Work Product
56	SOM0001132	Memorandum	7/17/2013	Michael Gadola	Matthew Schneider	Memorandum providing legal advice regarding potential risks to the State of Michigan in a Detroit Bankruptcy.	Duplicate of item #49.	Attorney Client Communication; Attorney Work Product
57	SOM0001133	Email with handwritten notes	1/7/2013	Frank Monticello; Frederick Headen	Andy Dillon	Communications with counsel and advice from counsel regarding conflict issue of candidate for emergency manager.	Upon further review, a portion of the document is not privileged and a redacted version is produced.	Attorney Client Communication; Executive Privilege; Protective Order Entered 10/08/13
58	SOM0001134	Handwritten notes	Upon further review, this document should not have been included with privilege log. It is nonresponsive.					Notes regarding consulting firm. N/A
59	SOM0001135 - SOM0001136	Email	7/10/2013	Andy Dillon	Michael Finney	Email with name of candidate for emergency manager.	Redacted and produced.	Executive Privilege; Protective Order Entered 10/08/13
60	SOM0001137 - SOM0001141	Resume	Unknown	Resume	Resume	Resume of candidate for emergency manager.	Redacted and produced.	Executive Privilege; Protective Order Entered 10/08/13
61	SOM0001142	Email	2/20/2013	Kevin Orr; Sue	Richard Baird	Communication regarding appointment of emergency manager. Communication contains personal email address of a citizen.	Redacted and produced.	Privacy
62	SOM0001143 - SOM0001146	Email	Upon further review, this document should not have been included with privilege log. A copy is provided.					Email regarding press inquiry. N/A
63	SOM0001147 - SOM0001148	Email	Upon further review, this document should not have been included with privilege log. It is nonresponsive.					Email regarding press inquiry. N/A
64	SOM0001149 - SOM0001150	Email	Upon further review, this document should not have been included with privilege log.					It was produced as SOM 0000604 - 0000605 N/A

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**EXHIBIT D**

**STATE OF MICHIGAN'S RESPONSE TO MOTION OF  
INTERNATIONAL UNION, UAW AND FLOWERS PLAINTIFFS  
TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON  
GROUND OF PRIVILEGE BY THE STATE OF MICHIGAN**

EXHIBIT D - Case Opinion - Pulte Homes

Not Reported in F.Supp.2d, 2011 WL 8212 (E.D.Mich.)  
(Cite as: 2011 WL 8212 (E.D.Mich.))

## H

Only the Westlaw citation is currently available.

United States District Court,  
E.D. Michigan,  
Southern Division.  
PULTE HOMES, INC., Plaintiff/Counter-defendant,  
v.  
AMERICAN GUARANTEE, AND LIABILITY  
INSURANCE COMPANY, Defendant/  
Counter-Plaintiff.

Civil Action No. 09-CV-11616.  
Jan. 3, 2011.

[Jeremy F. Heinnickel](#), [John N. Ellison](#), [Timothy P. Law](#), Reed Smith LLP, Philadelphia, PA, [Thomas P. Van Dusen](#), Bodman, Troy, MI, for Plaintiff/Counter-defendant.

[Blaise S. Curet](#), [Debra R. Puebla](#), Sinnott, Puebla, Campagne & Curet, APLC, San Francisco, CA, [Carol G. Schley](#), [Peter B. Kupelian](#), Kupelian, Ormond, Southfield, MI, for Defendant/Counter-Plaintiff.

***OPINION AND ORDER GRANTING IN PART  
AND DENYING IN PART PLAINTIFF'S MOTION  
TO COMPEL AMERICAN GUARANTEE AND  
LIABILITY INSURANCE COMPANY TO PRO-  
DUCE COMPLETE RESPONSES TO DISCOV-  
ERY (DOCKET NO. 53)***

[MONA K. MAJZOUB](#), United States Magistrate Judge.

\*1 This matter comes before the Court on Plaintiff's Motion To Compel American Guarantee And Liability Insurance Company to Produce Complete Responses To Discovery filed on October 1, 2010. (Docket no. 53). Defendant filed a Response Brief in Opposition on October 19, 2010. (Docket no. 58).

Plaintiff filed a Reply Brief on October 26, 2010. (Docket no. 63). The parties filed a Joint Statement of Resolved and Unresolved Issues on December 13, 2010. (Docket no. 71). This matter was referred to the undersigned for hearing and determination pursuant to [28 U.S.C. § 636\(b\)\(1\)\(A\)](#). (Docket no. 54). The Court heard oral argument on this matter on December 20, 2010. The matter is ready for ruling.

On April 6, 2010 Plaintiff served on Defendant its First Set of Interrogatories, First Set of Requests For Admission and First Set of Requests for Production of documents. On May 24, 2010 Defendant served responses and objections. Correspondence ensued between the parties. On September 8, 2010 Defendant served supplemental answers, responses and objections to some of the discovery. Plaintiff brings this motion to compel full and complete responses to the following: Request for Admission Nos. 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 19 and 20; Interrogatory Nos. 6, 7, 8, 9, 12 and 13; and Request for Production Nos. 6, 9, 20, 21, 22, 27, 31, 32 and 33. Prior to the hearing the parties resolved Request for Production No. 20.

For the reasons set forth on the record the Court ordered the following:

- A. Request for Admission Nos. 6, 7, and 9 are deemed admitted;
- B. Request for Admission Nos. 4, 8, 10, 11 and 14 are deemed denied;
- C. Plaintiff's Motion is denied as to Request for Admission Nos. 12, 13 and 15 because Defendant's answers comply with [Fed.R.Civ.P. 36](#) and are admitted in part and denied in part as set forth therein;
- D. Request for Admission Nos. 19 and 20 are



Not Reported in F.Supp.2d, 2011 WL 8212 (E.D.Mich.)  
(Cite as: 2011 WL 8212 (E.D.Mich.))

stricken as ambiguous;

E. Defendant will amend its answers to the following: Interrogatory No. 6 to respond directly to the Interrogatory and state with respect to each activity whether it was completed and the results thereof; Interrogatory No. 8 to specifically identify all instances when it requested information about the claims and Plaintiff did not provide access or information, Interrogatory No. 12 and Interrogatory No. 13 to answer in full based on the information Defendant now has available;

F. Defendant will amend its answer to Interrogatory No. 9 to answer in full without objection. See United States v. Roxworthy, 457 F.3d 590, 593 (6th Cir., 2006); Fine v. Bellefonte Underwriters Ins., Co., 91 F.R.D. 420, 422 (D.C.N.Y.1981); and Janicker v. George Washington University, 94 F.R.D. 648, 650 (D.D.C.1982);

G. Plaintiff's Motion to Compel is denied as to Interrogatory No. 7;

H. Defendant will serve amended full responses and all responsive documents to Request for Production No. 6, Request for Production No. 9 (limited to the period from May 1, 1997 through 2001), and Request For Production No. 27 (limited to the period from September 1, 2006 through the present);

\*2 I. Plaintiff's Motion to Compel was denied as to Request for Production No. 31 as not limited to relevant information, Fed.R.Civ.P. 26(b)(1), and 33 as overly broad, not sufficiently specific and not limited to relevant information.

The Court now rules on the remaining Request for Production Nos. 21, 22 and 32, which were taken under advisement. Request for Production No. 21 seeks the complete file maintained by Alan Gray. Request for Production No. 22 asks for "[a]ll docu-

ments Zurich sent to or received from the Affiliated Alan Gray Companies relating to the Zurich Policies, the Legion Policies, the Claim and the Action." Defendant argues that the Alan Gray file and documents are protected by the attorney-client privilege. Mr Gray is not a party to this action and he is not an officer of either party. Defendant retained Mr. Gray's forensic accounting firm in 2007 to investigate the bases of Plaintiff's claims <sup>FNI</sup>.

<sup>FNI</sup>. The Gray audit concluded in August 2008 with a draft report. Defendant's counsel stated that the draft report has been produced to Plaintiff without a non-waiver agreement. Defendant's counsel also stated that there was no final report.

Defendant argues that it has produced all responsive documents including the entire claims investigation file except for correspondence between Mr. Gray and attorney Debra Puebla, which it argues is subject to attorney-client privilege. In its Response brief Defendant states that it "authorized Mr. Gray to communicate with its legal counsel about the nature and scope of his investigation and findings to assist legal counsel in its coverage evaluation." Defendant argues that Mr. Gray was Defendant's agent and as such, his communications are protected from disclosure by the attorney-client privilege.

The Court notes that the parties have not properly briefed this issue with respect to Plaintiff's Motion to Compel and have incorporated by reference arguments from Plaintiff's August 30, 2010 motion to compel documents responsive to the Alan Gray Subpoena, which was denied by this Court. (Docket no. 43). The only privilege log related to Alan Gray documents which appears on the docket before the Court is the privilege log filed with Defendant's Response Brief in Opposition to Plaintiff's motion to compel relating to the subpoena served on Alan Gray. The Court must look to that set of pleadings to determine the sufficiency of Defendant's amended priv-



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ilege log, and the Court will examine the only privilege log before it relating to the Alan Gray documents.

In a case “brought under the Court's diversity jurisdiction and featuring only state-law claims, Michigan law governs the scope of the attorney/client privilege. See [Fed.R.Evid. 501](#).” [Infosystems, Inc. v. Ceridian Corp.](#), 197 F.R.D. 303, 305 n. 2 (E.D.Mich.2000). Under Michigan law,

[t]he attorney-client privilege attaches to direct communication between a client and his attorney as well as communications made through their respective agents. The scope of the attorney-client privilege is narrow, attaching only to confidential communications by the client to his advisor that are made for the purpose of obtaining legal advice.

[Leibel v. General Motors Corp.](#), 250 Mich.App. 229, 646 N.W.2d 179, 183 (Mich.App.2002). “The privilege, however, cannot protect the actual facts underlying the information contained in a communication between attorney and client; the privilege protects only confidential communications between attorney and client.” [State Farm Mutual Auto. Inc. Co. v. Hawkins](#), 2008 WL 5383855 at \*2 (E.D.Mich. Dec.23, 2008) (citing [Reed Dairy Farm v. Consumers Power Co.](#), 227 Mich.App. 614, 576 N.W.2d 709, 712 (Mich.Ct.App.1998)). “Communications between an attorney and client which relate to business, rather than legal matters, do not fall within the protection of the attorney-client privilege.” [Michigan First Credit Union v. Cumis Ins. Soc’y, Inc.](#), 2006 U.S. Dist. LEXIS 45202 at \*5–6, 2006 WL 1851018 (E.D.Mich. July 5, 2006) (citing [Coleman v. American Broadcasting Corp., Inc.](#), 106 F.R.D. 201, 205 (D.D.C.1985)). The burden to show that a matter is not discoverable because it is privileged rests upon the party asserting privilege. [Infosystems, Inc.](#), 197 F.R.D. at 306.

\*3 Defendant argues that Mr. Gray is its agent. As

Plaintiff points out, Mr. Gray was hired almost two years prior to the filing of Plaintiff's lawsuit and Defendant's counter-claim. Defendant argues that Ms. Puebla was coverage counsel and did not undertake the claims investigation. Defendant's argument pointedly highlights the fine line set forth by the courts in determining whether a lawyer is acting in the capacity of a lawyer giving legal advice and not as an investigator working in an “ongoing, open investigation into a claim.” [Mich. First Credit Union](#), 2006 U.S. Dist. LEXIS at \*6 (noting that one of the documents was dated “well before even the initial denial of the claim” and to protect the pre-November 2005 communications “from disclosure would give too broad a scope to attorney-client privilege, and in a larger sense would permit an insurer to construct a ‘shroud of secrecy’ by simply designating an attorney to conduct an otherwise ordinary claim investigation.” *Id.*).

Despite alleging this distinction in Ms. Puebla's capacity, Defendant's Amended Privilege Log (docket no. 48 Ex. K) and Redacted Log (relating to redacted portions of the Alan Gray documents, docket no. 48–1, 48–2, 48–3) do not “describe the nature of the documents, communications, or tangible things not produced or disclosed—... in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the claim,” as required by [Fed.R.Civ.P. 26\(b\)\(5\)\(A\)\(ii\)](#).

Defendant's “Alan Gray Documents–Amended Privilege Log” sets forth the date of the document, author, recipients, persons copied, a “description” of the document, a “purpose” of the document and the privilege or claim, which are predominately “attorney-client privilege.” (Docket no. 48). Every “description” of a document states either “Email[s] relating to Alan Gray audit of Pulte claim files” or “Email[s] relating to Alan Gray report for audit of Pulte claim files.” Five entries on the Redacted Log describe an “Email related to Alan Gray, Inc.'s rates for services,” accounting document and/or a new file

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creation form and are identified as “confidential/proprietary; relevance” instead of attorney client privilege. (Docket no. 48–3). It does not appear that documents “GRAY000965,” “GRAY000966,” “GRAY000970,” “GRAY001190” and “GRAY001236” are at issue in this motion and they are not relevant to the issues in this action. [Fed.R.Civ.P. 26\(b\)\(1\)](#).

The “Purpose” of each document states that the communication is between, from and/or to AGLIC (Defendant), AGLIC's Counsel and/or AGLIC's agent and identifies the purpose of each document as the following: “[r]elated to AGLIC counsel's ongoing role in representing AGLIC in order to provide coverage analysis and legal advice as issues arise in connection with Pulte's demand for payment under policies.” (Docket no. 48 Ex. K, 48–1, 48–2, 48–3). Substantively, Defendant's descriptions of the documents and their respective purposes offer nothing more than a conclusory assertion that each document relates to the subject of this action and is “related” to legal advice, without any further information.

\*4 Defendant has already amended this privilege log once and the parties have argued this issue at hearing. The Court does not find that a second amended privilege log will aid in showing that the documents are covered by the attorney-client privilege where Defendant has had the opportunity to establish privilege in a privilege log, an amended log, its brief and at hearing and has failed to do so. The Court is left to speculate as to whether any legal advice was sought or given with respect to each document.

Furthermore, despite the unsupported allegation that Ms. Puebla is coverage counsel and did not undertake the claims investigation(s), the timeline of the “Alan Gray” documents in conjunction with Plaintiff's demands for payment weigh in favor of concluding that these communications were related to business and an ongoing investigation of the claims at issue. Defendant's boilerplate descriptions in the privilege

log, despite the allegation that the documents are “related to” counsel's role in providing legal advice, are not inconsistent with this finding. The privilege logs describe counsel's “ongoing role” in providing coverage analysis and fail on a basic level to clearly assert whether each document seeks or conveys legal advice [FN2](#). Defendant has simply failed to meet its burden of showing that these documents are not discoverable.

[FN2](#). The Court also notes that Defendant has been, to date, unwilling to provide a date or time frame when its investigation became or was undertaken in anticipation of litigation.

Request for Production No. 32 seeks “[a]ll communications with Zurich's reinsurance companies concerning the Claim.” The Court finds that this request is overly broad and not limited to relevant information and documents. The Court will deny Plaintiff's motion as to Request for Production No. 32. [Fed.R.Civ.P. 26\(b\)\(1\)](#).

**IT IS THEREFORE ORDERED** that Plaintiff's Motion To Compel American Guarantee And Liability Insurance Company To Produce Complete Responses To Discovery (docket no. 53) is GRANTED as to Request For Production Nos. 21 and 22 related to the Alan Gray documents, is DENIED as to Request For Production No. 32 and is further GRANTED in part and DENIED in part as set forth herein and on the record.

**IT IS FURTHER ORDERED** that Defendant will produce all amended answers and full responses as ordered within thirty (30) days of entry of this Order.

**IT IS FURTHER ORDERED** that payment of attorneys fees and costs will not be ordered. [Fed.R.Civ.P. 37\(a\)\(5\)\(A\)\(ii\), \(iii\)](#).

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**NOTICE TO THE PARTIES**

Pursuant to [Fed.R.Civ.P. 72\(a\)](#), the parties have a period of fourteen days from the date of this Order within which to file any written appeal to the District Judge as may be permissible under [28 U.S.C. 636\(b\)\(1\)](#).

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Pulte Homes, Inc. v. American Guarantee, and Liability Ins. Co.

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